

1 Ben M. Davidson (State Bar No. 181464)
 DAVIDSON LAW GROUP, ALC
 2 11377 West Olympic Boulevard
 Los Angeles, California 90064
 3 Telephone: (310) 473-2300
 Facsimile: (310) 473-2941
 4 Email: b davidson@davidson-lawfirm.com

5 Nadya C. Davis (admitted *pro hac vice*)
 HOLLAND & HART, LLP
 6 1800 Broadway, Suite 300
 Boulder, Colorado 80302
 7 Telephone: (303) 473-2700
 Facsimile: (303) 473-2720
 8 E-mail: ncdavis@hollandhart.com

9 Attorneys for Plaintiff
 RE/MAX, LLC

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF CALIFORNIA**

RE/MAX, LLC, a Delaware limited liability
 company,

Plaintiff,

v.

ARE GROUP, INC., a California corporation,
 d/b/a AMEN REAL ESTATE, and JAMES
 AMEN, an individual,

Defendants.

Case No. 2:17-cv-00360-MCE-EFB

**STIPULATED REQUEST TO STAY
 PROCEEDINGS FOR TWO WEEKS
 PENDING SETTLEMENT; ORDER**

1 Plaintiff, RE/MAX, LLC (“Plaintiff”), and Defendants, ARE Group, Inc., d/b/a Amen Real
2 Estate, and James Amen (“Defendants”) (Plaintiff and Defendants collectively, “the Parties”), by
3 and through their respective attorneys, hereby submit this Stipulated Request to Stay the Proceedings
4 for Two Weeks to allow the Parties time to finalize a settlement. As grounds for this Request, the
5 Parties jointly state as follows:

6 1) Plaintiff filed its Complaint on February 17, 2017 [Dkt. 1].

7 2) Defendants were served with the Complaint on February 23, 2017 [Dkts. 6-7].

8 3) Since shortly after service of the Complaint, the Parties have been negotiating the
9 terms of a settlement that would resolve all claims at issue in the Complaint.

10 4) The Parties recently came to agreement on the keys terms for a full settlement, and
11 are now negotiating a formal settlement agreement, which they anticipate being able to finalize
12 within two weeks.

13 5) The Parties respectfully request that the Court stay all deadlines in this case for two
14 weeks to allow the Parties time to finalize their settlement document.

15 Dated: April 19, 2017

16 Respectfully submitted,

17 /s Ben M. Davidson

18 Ben M. Davidson
19 DAVIDSON LAW GROUP, ALC
20 11377 West Olympic Boulevard
21 Los Angeles, California 90064
22 Telephone: (310) 473-2300
23 Facsimile: (310) 473-2941
24 Email: b davidson@davidson-lawfirm.com
25 **ATTORNEY FOR PLAINTIFF**
26 **RE/MAX, LLC**

27 /s Erica L. Rosasco (as authorized on April 19, 2017)

28 Erica L. Rosasco
MCKAGUE ROSASCO PC
2202 Plaza Drive
Rocklin, CA 95756
Telephone: (916) 672-6552
Facsimile: (916) 672-6563
Email: erica@mckaguerosaco.com
ATTORNEY FOR DEFENDANTS


1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

In accordance with the foregoing stipulation, and good cause appearing, the Court hereby stays all deadlines in this case for two weeks from the date this Order is electronically filed.

IT IS SO ORDERED.

Dated: April 24, 2017


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE