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Attorneys for Defendant  
 11 PRIMITIVES BY KATHY, INC.

12  
 13 UNITED STATES DISTRICT COURT  
 14 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION  
 15

16 CHRISTINE N. TRICE,  
 17 Plaintiff,  
 18 v.  
 19 PRIMITIVES BY KATHY, INC., and DOES  
 1 to 10, inclusive,  
 20 Defendants.  
 21

Case No. 2:17-CV-00586-TLN-CKD

**SECOND STIPULATION AND ORDER  
 FOR EXTENSION OF TIME TO  
 RESPOND TO COMPLAINT, AND  
 RELATED DEADLINES**

Complaint Filed: March 20, 2017  
 Trial Date: Not Yet Set

**RECITALS**

22  
 23 On May 16, 2017, the Court—pursuant to the stipulation of Plaintiff CHRISTINE N. TRICE  
 24 and Defendant PRIMITIVES BY KATHY, INC—entered an order continuing Defendant’s deadline  
 25 to respond to Plaintiff’s Complaint filed herein, and additionally extended certain related deadlines  
 26 pertaining to the parties’ Joint Status Report and Initial Disclosures. (CM/ECF Doc. No. 10.) Per that  
 27 stipulation and order, Defendant’s deadline to respond to Plaintiff’s Complaint falls on June 19, 2017.  
 28

1 Since the Court's entry of its order, the parties continue to engage in intensive settlement  
2 negotiations that they believe will likely resolve the case. Unfortunately, those negotiations have not  
3 yet produced a final agreement. Hence, in the hopes of concluding their negotiations without the need  
4 to submit imminent court filings, the parties wish to secure one further and final 30-day extension for  
5 Defendant to respond to Plaintiff's Complaint, and to continue the Rule 26-related deadlines specified  
6 in the Court's Order Requiring Joint Status Report (CM/ECF Doc. No. 3) for a like period. Should a  
7 full settlement not be forthcoming within that additional 30-day time period, Defendant will file its  
8 response in accordance with the new deadline, with no further extension requests.

9 **STIPULATION**

10 Pursuant to Local Rule 144(a), the parties, by and through their duly-authorized attorneys,  
11 HEREBY STIPULATE AND AGREE as follows:

- 12 1. Defendant shall have an additional thirty (30) days in which to respond to the  
13 Complaint filed in this matter. The initial deadline for Defendant's response  
14 (following Defendant's waiver of service under Federal Rule of Civil Procedure 4(d))  
15 was May 19, 2017, with a prior extension granted to June 19, 2017; pursuant to the  
16 instant stipulation, the new deadline for Defendant to file and serve its response to  
17 Plaintiff's Complaint shall be ***July 19, 2017***, inclusive.
- 18 2. The deadline for the parties to confer as required by Federal Rule of Civil Procedure  
19 26(f) and Paragraph 4 of the Court's aforementioned Order Requiring Joint Status  
20 Report shall be continued to ***August 18, 2017***, inclusive.
- 21 3. The deadline for the parties to prepare and submit the Joint Status Report required by  
22 Paragraph 4 of the Court's aforementioned Order Requiring Joint Status Report shall  
23 be continued to ***August 18, 2017***, inclusive.
- 24 4. The deadline for the parties to exchange their Initial Disclosures shall be continued to  
25 ***September 1, 2017***, inclusive.

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27 ***[Signatures on Next Page]***

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SO STIPULATED.

DATED: June 21, 2017

WILKE, FLEURY, HOFFELT,  
GOULD & BIRNEY, LLP

By:   /s/ Daniel L. Baxter    
DANIEL L. BAXTER  
Attorneys for Defendant  
PRIMITIVES BY KATHY, INC.

DATED: June 21, 2017

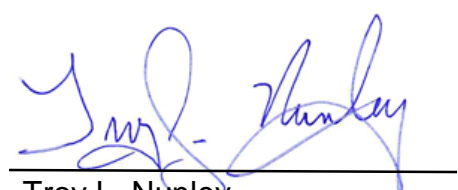
DICKENSON PEATMAN & FOGARTY P.C.

By:   /s/ Christopher J. Passarelli    
CHRISTOPHER J. PASSARELLI  
Attorneys for Plaintiff  
CHRISTINE N. TRICE

**ORDER**

IT IS SO ORDERED.

Dated: June 21, 2017

  
\_\_\_\_\_  
Troy L. Nunley  
United States District Judge