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INVESTMENTS, LLC; DPG GOLDEN EAGLE, LLC;
8 SPRING TREE LENDING, LLC; SPRING TREE
HOLDINGS, LLC; SPRING TREE FINANCIAL, LLC;
9 SKIBO HOLDINGS, LLC; GERALD T. HUDSPETH;
JEROME J. JOSEPH; and WILLIAM J. BROOKSBANK
10

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16 Attorneys for Plaintiff JOHN MARSHALL

17 UNITED STATES DISTRICT COURT
18 EASTERN DISTRICT OF CALIFORNIA
19

20 JOHN MARSHALL, an individual,,

21 Plaintiff,

22 v.

23 DANIEL P. GALVANONI, an
24 individual; DPG INVESTMENTS,
LLC, a foreign limited liability
25 company; DPG GOLDEN EAGLE,
26 LLC, a foreign limited liability
27 company; SPRING TREE LENDING,
LLC, a foreign limited liability
28 company; SPRING TREE HOLDINGS,

Case No. 2:17-cv-00820-KJM-CKD

STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT AND TO
FILE MOTION FOR REMAND; ORDER

Complaint Filed: March 09, 2017

1 LLC, a foreign limited liability
2 company; SPRING TREE
3 FINANCIAL, LLC, a foreign limited
4 liability company; SKIBO HOLDINGS,
5 LLC, a foreign limited liability
6 company; GERALD T. HUDSPETH,
7 an individual; JEROME J. JOSEPH, an
8 individual; WILLIAM J.
9 BROOKSBANK, an individual; and
10 DOES 1-100, inclusive,

11 Defendants.

12 Pursuant to the Eastern District of California Local Rules 144 and 145,
13 Plaintiff JOHN MARSHALL ("Plaintiff") and Defendants DANIEL P.
14 GALVANONI; DPG INVESTMENTS, LLC; DPG GOLDEN EAGLE, LLC;
15 SPRING TREE LENDING, LLC; SPRING TREE HOLDINGS, LLC; SPRING
16 TREE FINANCIAL, LLC; SKIBO HOLDINGS, LLC; GERALD T. HUDSPETH;
17 JEROME J. JOSEPH; and WILLIAM J. BROOKSBANK ("Defendants")
18 (collectively, "Parties"), by and through their respective counsel of record, hereby
19 stipulate and agree that Defendants shall have until May 15, 2017, to respond to
20 the operative complaint in the above-captioned matter. The parties further
21 stipulate that plaintiff will file his Motion for Remand by May 15, 2017.

22 In entering this stipulation, the Parties note that Defendants' responsive
23 pleadings are currently due May 5, 2017, which was a date selected by the parties
24 for uniformity in light of the various dates that different defendants were served
25 with the Summons and Complaint. Plaintiff is hereby stipulating to file his Motion
26 for remand concurrently with the Defendants' responsive pleadings in order to
27 promote judicial economy.

28 Good cause exists for the request as the Parties have been diligently meeting
and conferring in an effort to avoid the filing of the Motion for Remand and the
dispositive motions that Defendants currently intend to file in response to

1 Plaintiff's operative pleading. The Parties have informally exchanged certain
2 evidence and the Parties are currently reviewing the evidence provided, discussing
3 the evidence with respective clients, and making determinations as to whether the
4 dispositive motions and/or the Motion for Remand will ultimately be necessary.

5 At this point, it is anticipated the Parties conduct further meet and confer
6 over the evidence exchanged as well as potentially gather and exchange additional
7 evidence. As such, the Parties have agreed that the Motion for Remand and
8 response by the defendants to the operative complaint shall be May 15, 2017.

9 The proposed continuance is for ten (10) days and no other extensions of
10 time have been requested or received on either the Motion for Remand or
11 Defendants' response to the operative complaint.

12 The Parties have sought this extension as soon as it became apparent that
13 additional evidence may be exchanged and that further meet and confer efforts are
14 warranted prior to the filing of the Motion for Remand and the dispositive motions
15 by Defendants.

16 In entering this stipulation, Defendants expressly reserve all defenses.

17
18 DATED: May 5, 2017

BRADFORD G. HUGHES
TIFFANY HUNTER
SELMAN BREITMAN LLP

19
20
21 By: _____
22 BRADFORD G. HUGHES
TIFFANY HUNTER
23 Attorneys for Defendants DANIEL P.
24 GALVANONI; DPG INVESTMENTS,
25 LLC; DPG GOLDEN EAGLE, LLC;
26 SPRING TREE LENDING, LLC;
27 SPRING TREE HOLDINGS, LLC;
28 SPRING TREE FINANCIAL, LLC;
SKIBO HOLDINGS, LLC; GERALD T.
HUDSPETH; JEROME J. JOSEPH; and
WILLIAM J. BROOKSBANK

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DATED: May 5, 2017

MELINDA JANE STEUER
LAW OFFICES OF MELINDA JANE
STEUER

By: _____
MELINDA JANE STEUER
Attorney for Plaintiff JOHN
MARSHALL

ORDER

Pursuant to stipulation, and for good cause shown, Defendants' deadline to respond to Plaintiff's operative complaint is extended to May 15, 2017. Additionally, Plaintiff shall file his Motion for Remand by May 15, 2017.

IT IS SO ORDERED:

Dated: May 9, 2017.


UNITED STATES DISTRICT JUDGE