1 Jennifer E. Duggan, SBN: 183833 Christina M. Bucci, SBN: 292047 **DUGGAN LAW CORPORATION** 2 641 Fulton Ave., Suite 200 Sacramento, CA 95825 3 Telephone: 916.550.5309 Facsimile: 916.404.5900 4 jennifer@duggan-law.com 5 Attorneys for Defendant 6 FRANK CHARLES YANEZ 7 UNITED STATES DISTRICT COURT 8 EASTERN DISTRICT OF CALIFORNIA 9 UNIVERSAL SECURITY AND FIRE, Case No. 2:17-cv-00844-TLN-CKD 10 INC., a California Corporation, STIPULATION AND ORDER RE: 11 Plaintiff, **EXTENSION** OF TIME UNTIL JULY 5, 2017 FOR DEFENDANT, 12 FRANK **CHARLES YANEZ** TO VS. **RESPOND** TO **PLAINTIFF'S** 13 ALPHA ALARM & AUDIO, INC., a **COMPLAINT** California Corporation; FRANK 14 CHARLES YANEZ; and DOES 1 through 30, Inclusive, Hon. Troy L. Nunley 15 Defendants. 16 17 Pursuant to Civil Local Rule 1, Plaintiff, UNIVERSAL SECURITY AND FIRE, INC. and 18 Defendant, FRANK CHARLES YANEZ, by and through their respective attorneys of record, Omar 19 M. Farooqui, Jennifer E. Duggan, and Christina M. Bucci, stipulate as follows: 20 1. Defendant, FRANK CHARLES YANEZ is granted an extension of time until July 5, 21 2017 to respond or otherwise plead in reference to Plaintiff, UNIVERSAL SECURITY AND FIRE 22 INC.'s Complaint; 23 2. Defendant, FRANK CHARLES YANEZ's response, including, but not limited to any 24 motions to dismiss, motions to compel arbitration, or motions related to personal jurisdiction, will be 25 due no later than July 5, 2017. 26 /// 27 /// 28 1.

| 1 | 3. | The reason for the requested enlargement of time is for the purpose of the parties to |
|----|--|---|
| 2 | meet and confer as to the deficiencies in the operative Complaint without incurring the costs and fees | |
| 3 | associated with any motions to dismiss, motion to compel arbitration, or motions related to personal | |
| 4 | jurisdiction; | |
| 5 | 4. | No prior modifications have been made in the case by stipulation or by Court order; |
| 6 | 5. | The requested time modification should have no effect on the overall schedule for the |
| 7 | case. | |
| 8 | IT IS | SO STIPULATED effective as of June 27, 2017. |
| 9 | | |
| 10 | Dated: June | 27, 2017 ELLAHIE & FAROOQUI, LLP |
| 11 | | By: <u>/s/ Omar M. Farooqui</u> Omar M. Farooqui |
| 12 | | Attorneys for Plaintiff, |
| 13 | | UNIVERSAL SECURITY AND FIRE, INC. |
| 14 | | |
| 15 | Dated: June | 27, 2017 DUGGAN LAW CORPORATION |
| 16 | | |
| 17 | | By: <u>/s/ Christina M. Bucci</u> Jennifer E. Duggan |
| 18 | | Christina M. Bucci Attorneys for Defendant, |
| 19 | | FRANK CHARLES YANEZ |
| 20 | | |
| 21 | | |
| 22 | | |
| 23 | | |
| 24 | | |
| 25 | | |
| 26 | | |
| 27 | | |
| 28 | | |

1 ATTESTATION OF CONCURRENCE I, Christina M. Bucci, attest that I am one of the attorneys for Defendant, FRANK 2 CHARLES YANEZ. As the ECF user and filer of this document, I attest that concurrence in the 3 4 filing of this document has been obtained from its signatories. 5 Dated: June 27, 2017 **DUGGAN LAW CORPORATION** 6 7 By: /s/ Christina M. Bucci_ Jennifer E. Duggan 8 Christina M. Bucci Attorneys for Defendant, 9 FRANK CHARLES YANEZ 10 11 **CERTIFICATE OF SERVICE** 12 The undersigned counsel for Defendant, FRANK CHARLES YANEZ, hereby certifies that a 13 true and correct copy of the foregoing document was filed with the Court and served electronically 14 through the CM-ECF (electronic case filing) system to all counsel of record to those registered to 15 receive a Notice of Electronic Filing for this case on June 27, 2017. 16 17 Dated: June 27, 2017 **DUGGAN LAW CORPORATION** 18 By: /s/ Christina M. Bucci_ 19 Jennifer E. Duggan Christina M. Bucci 20 Attorneys for Defendant, FRANK CHARLES YANEZ 21 22 23 24 25 26 27

28

ORDER

Upon consideration of the foregoing Stipulation, and good cause appearing therefore, IT IS HEREBY ORDERED:

1. Defendant, FRANK CHARLES YANEZ is ordered to file his response to Plaintiff, UNIVERSAL SECURITY AND FIRE, INC.'s Complaint, including, but not limited to, any motions to dismiss, motions to compel arbitration, or motions related to personal jurisdiction, no later than July 5, 2017

Dated: June 27, 2017

Troy L. Nunley

United States District Judge