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12 Attorneys for Plaintiffs LEONARD WONG,
13 SCOTT ZAWADA, MATTHEW ROSE,
MATTHEW LEE and ROBERT WATSON

15 UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF CALIFORNIA

18 LEONARD WONG, an individual; SCOTT
ZAWADA, an individual; MATTHEW
19 ROSE, an individual; MATTHEW LEE, an
individual; and ROBERT WATSON, an
20 individual,
21 Plaintiffs,
22 v.
23 CHRISTOPHER TOMASZEWSKI, an
individual; MIKE MERRI, an individual; and
24 DOES 1 through 25, inclusive,
25 Defendants.

CASE NO. 2:18-cv-00039-MCE-AC
**STIPULATION REQUESTING
EXTENSION TO FILE F.R.C.P. RULE
26(f)(2) REPORT; ORDER THEREON**
Courtroom 7
Hon. Morrison G. England, Jr.
Complaint Filed: November 27, 2017
Trial Date: Not Set

1 **IT IS HEREBY STIPULATED BY AND BETWEEN ALL PARTIES AS**
2 **FOLLOWS:**

3 Plaintiffs LEONARD WONG, SCOTT ZAWADA, MATTHEW ROSE, MATTHEW
4 LEE, and ROBERT WATSON (“Plaintiffs”), and Defendants CHRISTOPHER
5 TOMASZEWSKI and MIKE MERRI (“Defendants”) (collectively, the “Parties”), by and through
6 their respective counsel of record, hereby respectfully apply to this Court for an Order continuing
7 the date for the Parties to submit their Rule 26(f) Joint Report from March 9, 2018, to April 9,
8 2018, and exchange Initial Disclosures pursuant to Federal Rule of Civil Procedure (“FRCP”)
9 26(a)(1) 45 days after submission of said Joint Report.

10 WHEREAS, on January 16, 2018, Defendants filed a motion to dismiss all claims in this
11 action pursuant to FRCP Rule 12(b)(6) (“Motion to Dismiss”);

12 WHEREAS, on January 30, 2018, the Court cancelled the originally scheduled March 8,
13 2018, date for hearing on said motion via minute order; and

14 WHEREAS, the Parties have agreed that postponing the Joint Report and Initial
15 Disclosures till a date after this Court rules on the pending Motion to Dismiss would allow the
16 Parties to avoid potentially unnecessary litigation costs.

17 NOW THEREFORE, IT IS HEREBY STIPULATED, between the Parties, subject to this
18 Court’s approval, that: the date for the Parties to file its Rule 26(f) Joint Report be postponed until
19 April 9, 2018, and the time to serve Initial Disclosures pursuant to FRCP Rule 26(a)(1), be
20 continued until forty-five (45) days following the submission of said Joint Report.

21 Dated: March 9, 2018

GAVRILOV & BROOKS

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23 By: /s/ Eliezer M. Cohen (as authorized on 3/9/18)

24 OGNIAN GAVRILOV
25 MICHAEL COLEMEN
26 ELIEZER M. COHEN
27 Attorneys for Plaintiffs
28 LEONARD WONG, SCOTT ZAWADA,
 MATTHEW ROSE, MATTHEW LEE
 and ROBERT WATSON

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Dated: March 9, 2018

ROPERS, MAJESKI, KOHN & BENTLEY

By: /s/ Lita M. Verrier
LITA M. VERRIER
J. MARK THACKER
Attorneys for Defendants
CHRISTOPHER TOMASZEWSKI and
MIKE MERRI


ORDER

Pursuant to the parties' stipulation, the Court makes the following order:

The deadline to file a Joint Rule 26(f)(2) Report, currently due on March 9, 2018, is continued to April 6, 2018, and Initial Disclosures shall be served 45 days thereafter.

IT IS SO ORDERED.

Dated: March 17, 2018


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE