1 2 3 4 5 6	THOMAS P. QUINN, JR. (SBN 132268) NOKES & QUINN 410 Broadway, Suite 200 Laguna Beach, CA 92651 Tel: (949) 376-3500 Fax: (949) 376-3070 Email: tquinn@nokesquinn.com Attorney for Defendant EQUIFAX INC.	
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8	UNITED STATES DISTRICT COURT	
9	EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION	
10		
11	VANESSA VALENTE,	) Case No.: 2:18-cv-00496-JAM-CKD
12	Plaintiff,	) ) SECOND STIPULATION TO EXTEND
13		) TIME TO RESPOND TO COMPLAINT
14	VS.	) AND ORDER )
15	EQUIFAX INC.,	) Complaint Served: March 14, 2018
16	Defendant.	) Original Response Date: April 4, 2018
17		) Current Response date: May 11, 2018
18		) New Response Date: 30 Days from Filing of
19		<ul> <li>Plaintiff's First Amended Complaint</li> </ul>
20		—
21		
22	Plaintiff VANESSA VALENTE	("Plaintiff") and Defendant EQUIFAX INC.
23	("Defendant"), hereby stipulate as follows:	
24	1. Plaintiff served Defendant on March 14, 2018.	
25	2. Defendant's initial deadline to respond to the Complaint was April 4, 2018.	
26	3. Plaintiff and Defendant initially agreed to extend the time for Defendant to respond to	
27	the Complaint up to and including May 11, 2018, so that Defendant would have additional time	
28 to investigate this matter and the parties could expl		d explore the possibility of settlement. Accordingly,
	- 1 -	
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1	on March 30, 2018, Defendant filed a stipulation between Plaintiff and Defendant to extend		
2	Defendant's time to respond to the Complaint up to and including May 11, 2018 (docket # 6).		
3	4. On or about May 8, 2018, Plaintiff informed Defendant that she intended to file a First		
4	Amended Complaint. Accordingly, Plaintiff and Defendant agreed that Defendant's deadline to		
5	answer, move, or otherwise respond to the Complaint should be further extended to 30 days from		
6	the filing date of the First Amended Complaint, and therefore Plaintiff and Defendant submit this		
7	second stipulation to extend time to respond to the Complaint.		
8	This change in response deadline will not alter the date of any event or any deadline		
9	already fixed by Court order, local rules, or the Federal Rules of Civil Procedure.		
10			
11	Respectfully submitted May 9, 2018:		
12			
13	NOKES & QUINN		
14	/s/ Thomas P. Quinn, Jr.		
15	THOMAS P. QUINN, JR. (Bar No. 132268) NOKES & QUINN		
16	410 Broadway, Suite 200		
17	Laguna Beach, CA 92651 Tel: (949) 376-3500		
18	Fax: (949) 376-3070 Email: tquinn@nokesquinn.com		
19	Attorney for Defendant Equifax Inc.		
20			
21	/s/ Elliot W. Gale ELLIOT W. GALE (Bar No. 263326)		
22	SAGARIA LAW, P.C.		
23	3017 Douglas Blvd, Suite 200 Roseville, CA 95661		
24	Tel: (408) 279-2288 Fax: (408) 279-2299		
25	Email: egale@sagarialaw.com		
26	Attorney for Plaintiff		
27			
28			
	- 2 -		
200	SECOND STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT AND		

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SECOND STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT AND [PROPOSED] ORDER

1	Signature Attestation	
2		
3	I obtained the authorization of Elliot W. Gale to affix his signature to this stipulation and	
4	submit this stipulation on his behalf.	
5	May 9, 2018 /s/ Thomas P. Quinn, Jr.	
6	THOMAS P. QUINN, JR.	
7		
8	ORDER	
9	Pursuant to stipulation, Defendant Equifax Inc. is granted a further extension to respond to	
10	Plaintiff's complaint until 30 days from the date that Plaintiff files her first amended complaint.	
11		
12 13	IT IS SO ORDERED	
13	Dated: 5/9/2018 /s/ John A. Mendez	
15	HONORABLE JOHN A. MENDEZ	
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NOKES & QUINN	- 3 -	
410 Broadway, Suite 200 Laguna Beach, CA 92651 (949) 376-3500	SECOND STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT AND [PROPOSED] ORDER	