

1 SUZANNE K. BABB (Bar No. 229750)
 2 BEYERS COSTIN SIMON
 3 200 Fourth Street, Ste. 400
 4 Post Office Box 878
 5 Santa Rosa, California 95402-0878
 6 Tele: (707) 547-2000
 7 Fax: (707) 526-2746

8 *Attorneys for Plaintiff Samer Bishay*

9 Hannah L. Cannom (Bar No. 245635)
 10 WALKER STEVENS CANNOM LLP
 11 500 Molino Street, Suite 118
 12 Los Angeles, California 90013
 13 Tele: (213) 337-9972
 14 Fax: (213) 403-4906

15 *Attorneys for Defendant, ICON Aircraft, Inc.*

16 UNITED STATES DISTRICT COURT
 17 FOR THE EASTERN DISTRICT OF CALIFORNIA
 18 SACRAMENTO DIVISION

19 SAMER BISHAY,
 20 Plaintiff,
 21 v.
 22 ICON AIRCRAFT, INC., a Delaware
 23 corporation,
 24 Defendant.

Civil Action No. 2:19-cv-00178-KJM-AC

**STIPULATION TO EXTEND TIME FOR
 PLAINTIFF TO FILE AMENDED
 COMPLAINT; ORDER**

JURY TRIAL DEMANDED

STIPULATION TO EXTEND TIME FOR PLAINTIFF TO FILE AMENDED COMPLAINT

1 Plaintiff Samer Bishay (“Plaintiff”) and Defendant, ICON Aircraft, Inc. (“ICON”), by and
2 through their attorneys of record in this case, stipulate and agree as follows:

3 WHEREAS, on February 12, 2020, ICON filed a motion to dismiss Plaintiff’s Second Amended
4 Complaint;

5 WHEREAS, on September 14, 2020, the Court entered an order granting ICON’s motion, with
6 leave for Plaintiff to amend his complaint within 21 days of the Order.

7 WHEREAS, Plaintiff’s counsel resides in Sonoma County, California, which has been the site
8 of devastating firestorms. The attendant evacuations, destroyed infrastructure, and lack of access to
9 files and reliable telephone and internet connections has prevented Plaintiff’s counsel from being able
10 to address the Court’s Order with her client within the Court’s timeframe;

11 WHEREAS, Plaintiff’s counsel requested and Defendant’s counsel has agreed to a ten day
12 extension of time for Plaintiff to file his amended complaint, should he elect to do so;

13 IT IS HEREBY STIPULATED by and between the parties hereto through their respective
14 attorneys that the last day for Plaintiff to file an amended complaint is extended to October 15, 2020.

15 IT IS SO STIPULATED.

16
17 Respectfully submitted,

18
19 BEYERS COSTIN SIMON

20 Dated: October 5, 2020

21 /s/ Suzanne K. Babb
22 By: _____
23 SUZANNE K. BABB
24 Attorneys for Plaintiff

25 WALKER STEVENS CANNOM LLP

26 Dated: October 5, 2020

27 /s/ Hannah L. Cannom
28 By: _____
HANNAH L. CANNOM
Attorneys for Defendant

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


ORDER

The Court, having duly considered the parties' stipulation set forth above, and good cause appearing, orders as follows:

Plaintiff's deadline to file an amended complaint is extended to October 15, 2020.

IT IS SO ORDERED.

Dated: October 9, 2020.



CHIEF UNITED STATES DISTRICT JUDGE