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 10 Cosumnes Corporation dba Murieta Equestrian Center

11
 12 **UNITED STATES DISTRICT COURT**
 13
 14 **EASTERN DISTRICT OF CALIFORNIA**

15 CALIFORNIA COASTKEEPER,
 16 ALLIANCE

17 Plaintiff,

18 v.

19 COSUMNES CORPORATION dba
 20 MURIETA EQUESTRIAN CENTER,

21 Defendant.

Case No. 2:20-cv-01703-TLN-DB

STIPULATION AND ORDER RE
 EXTENSION OF TIME FOR COSUMNES
 CORPORATION TO RESPOND TO
 PLAINTIFF’S FIRST AMENDED
 COMPLAINT, AND EXTENSION OF TIME
 FOR PLAINTIFF TO RESPOND TO
 INITIAL RESPONSIVE PLEADING BY
 COSUMNES CORPORATION

22 TO THE HONORABLE COURT AND TO ALL PARTIES OF RECORD:

23 IT IS HEREBY STIPULATED and agreed that Plaintiff CALIFORNIA
 24 COASTKEEPER ALLIANCE (“Plaintiff”) and Defendant COSUMNES CORPORATION dba
 25 MURIETA EQUESTRIAN CENTER (“Defendant”), collectively the “Parties” hereby stipulate
 26 to extend the time for Defendant to answer or otherwise respond to Plaintiff’s First Amended
 27 Complaint For Civil Penalties and Injunctive and Declaratory Relief for Violation of Water
 28 Pollution Control Act and Resource Conservation and Recovery Act.

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1 Plaintiff filed its initial Complaint and then on or about October 1, 2020 Plaintiff filed its
2 First Amended Complaint, herein "FAC" (ECF #4). On or about October 7, 2020 Plaintiff filed
3 its Proof of Service and return of summons indicating service of the FAC on or about October 7,
4 2020 (ECF #6). With a service date of October 7, 2020, the initial response would be due October
5 29, 2020.

6 Thereafter, Defendant Consumes Corporation had some communication with Plaintiff's
7 counsel about the case, including an extension of time to respond, but did not immediately
8 respond to or answer the FAC. Defendant then retained Burton Law Firm, including Jeb U.
9 Burton, John S. Knowlton and John L. Boze as defense counsel.

10 On or about November 6, 2020, Mr. Knowlton emailed Plaintiff's counsel Mr. Flanders
11 about an extension of time for Defendant to answer or respond to the FAC. After minimal
12 discussions on this issue, an agreement was made between counsel to extend the time as set forth
13 herein.

14 WHEREFORE, the Parties through their counsel stipulate and respectfully request that
15 this Court allow Defendant Cosumnes Corporation up to and including November 20, 2020 to
16 answer or otherwise respond to Plaintiff's FAC. It is also stipulated Plaintiff may have an
17 additional fourteen (14) days following service of Defendant's initial response to the FAC to
18 respond to that pleading.

19 The Parties hereto also respectfully request that the Status (Pretrial Scheduling)
20 Conference be set with these dates.

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1 SO STIPULATED.

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3 Dated: November 13, 2020.

AQUA TERRA AERIS LAW GROUP

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5 */s/ Jason R. Flanders*

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8 Jason R. Flanders, Esq.
9 Attorneys for Plaintiff,
10 California Coastkeeper Alliance

11 Dated: November 13, 2020.

THE BURTON LAW FIRM

12 */s/ John S. Knowlton*

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14 John S. Knowlton, Esq.
15 Jeb U. Burton, Esq.
16 Attorneys for Defendants,
17 Cosumnes Corporation dba
18 Murieta Equestrian Center

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1 **ORDER**

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3 The Court has reviewed the above stipulation by counsel regarding the allowance of

4 additional time up to and including November 20, 2020 for Defendant Cosumnes Corporation to

5 answer or otherwise respond to Plaintiff California Coastkeeper Alliance’s First Amended

6 Complaint, and thereafter for Plaintiff to have an additional fourteen (14) days beyond the

7 customary time to respond to any initial pleading by Defendant. Good cause appearing therefore,

8 and pursuant to stipulation of the Parties:

9 IT IS HEREBY ORDERED that Defendant Cosumnes Corporation shall have up to and

10 including November 20, 2020 to answer or otherwise respond to Plaintiff’s First Amended

11 Complaint; and

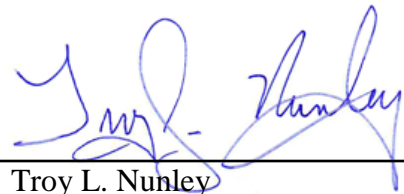
12 IT IS FURTHER ORDERED that Plaintiff California Coastkeeper Alliance shall have an

13 additional fourteen (14) days so as to respond to Defendant’s initial response to the First

14 Amended Complaint.

15 **IT IS SO ORDERED.**

16 Dated: November 13, 2020

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Troy L. Nunley
United States District Judge

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