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16 Attorneys for Plaintiff CHRISTOPHER  
 17 LANGER

18 **UNITED STATES DISTRICT COURT**  
 19 **EASTERN DISTRICT OF CALIFORNIA**  
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21 CHRIS LANGER,  
 22  
 23 Plaintiff,  
 24 vs.  
 25 HV GLOBAL GROUP, INC., a Delaware  
 corporation,  
 26 Defendants.  
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Case No. 2:21-cv-00328-JAM-KJN

**STIPULATION TO STAY  
 DEFENDANT'S DEADLINE TO  
 RESPOND TO PLAINTIFF'S FIRST  
 AMENDED COMPLAINT (L.R. 143)**

1 Plaintiff Chris Langer (“Plaintiff”) and Defendant HV Global Group, Inc., (“HV  
2 Global”), by and through their undersigned counsel, and pursuant to Civil Local Rule 143,  
3 respectfully submit this Stipulation to Stay Defendant’s Deadline to Respond to Plaintiff’s  
4 First Amended Complaint, subject to the Court’s approval.

5 **WHEREAS**, on February 22, 2021, Plaintiff filed his Complaint in the above-  
6 captioned action (the “Complaint”);

7 **WHEREAS**, on April 12, 2021, HV Global filed a Motion to Dismiss Plaintiff’s  
8 Complaint and on June 10, 2021, HV Global filed an Amended Motion to Dismiss  
9 Plaintiff’s Complaint;

10 **WHEREAS**, on June 23, 2021, the Court ordered Plaintiff and HV Global to file a  
11 Joint Status Report within 30 days of the Court’s ruling on HV Global’s Amended Motion  
12 to Dismiss;

13 **WHEREAS**, on October 13, 2021, the Court issued an order granting HV Global’s  
14 Amended Motion to Dismiss, and setting Plaintiff’s deadline to file an amended complaint  
15 within 20 days and HV Global’s deadline to file a responsive pleading 20 days thereafter;

16 **WHEREAS**, on November 1, 2021, Plaintiff filed a First Amended Complaint;

17 **WHEREAS**, on November 12, 2021, Plaintiff and HV Global filed a Joint Status  
18 Report pursuant to the Court’s June 23, 2021 order, and agreed to participate in the  
19 Voluntary Dispute Resolution Program;

20 **WHEREAS**, on November 15, 2021, the Court referred the parties to the Voluntary  
21 Dispute Resolution Program;

22 **WHEREAS**, based on the Court’s order dated October 13, 2021, the deadline for  
23 HV Global to respond to Plaintiff’s First Amended Complaint is November 22, 2021;

24 **WHEREAS**, HV Global intends to file a motion to dismiss Plaintiff’s First  
25 Amended Complaint;

26 **WHEREAS**, in the interest of judicial economy, Plaintiff and HV Global wish to  
27 stay HV Global’s deadline to respond to the First Amended Complaint while the parties  
28 participate in the Voluntary Dispute Resolution Program;

1           **WHEREAS**, staying HV Global’s deadline for responding to Plaintiff’s First  
2 Amended Complaint will enable the parties to more efficiently move the case toward  
3 resolution without the need for briefing on HV Global’s Motion to Dismiss;

4           **NOW, HEREBY, THE PARTIES STIPULATE AND AGREE** that, pursuant to  
5 Local Rule 143 and subject to the Court’s approval, the deadline for HV Global to respond  
6 to Plaintiff’s First Amended Complaint will be stayed until 14 days after the parties have  
7 completed their participation in the Voluntary Dispute Resolution Program.

8           **IT IS SO STIPULATED AND AGREED.**

9 DATED: November 18, 2021

**CENTER FOR DISABILITY ACCESS**  
Chris Carson  
Raymond Ballister, Jr.  
Dennis Price  
Isabel Masanque

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14           /s/ Isabel Masanque  
Isabel Masanque  
*Attorneys for Plaintiff Chris Langer*

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16 DATED: November 18, 2021

**FOLEY & LARDNER LLP**  
Eileen R. Ridley  
John J. Atallah  
Sara A. Abarbanel

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21           /s/ John J. Atallah  
John J. Atallah  
*Attorneys for Defendant HV Global*  
*Group, Inc.*

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24 \* I attest that the other signatory listed, and on whose behalf this filing is submitted,  
25 concurs in the filing content and has authorized this filing.

26  
27 DATED: November 18, 2021

/s/ John J. Atallah  
John J. Atallah

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1 **IT IS SO ORDERED.**

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DATED: November 19, 2021

/s/ John A. Mendez  
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THE HONORABLE JOHN A. MENDEZ  
UNITED STATES DISTRICT COURT JUDGE