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9 *[Additional Counsel Appear on Signature Page]*

10 *Attorneys for Plaintiff and the Proposed Class*

11 **UNITED STATES DISTRICT COURT**  
 12 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

13 BRYCE HOELTKE, individually and on behalf  
 14 of all others similarly situated,

15 Plaintiff,

16 v.

17 QUALITY FIRST HOME IMPROVEMENT,  
 18 INC.,

19 Defendant.

Case No.: 2:21-cv-01823-KJM-CKD

**STIPULATION FOR EXTENSION OF  
 SCHEDULE; ORDER THEREON**

20 **IT IS HEREBY STIPULATED** by and between Plaintiff Bryce Hoeltke and Defendant  
 21 Quality First Home Improvement, Inc. (collectively, the “Parties”) hereto through the respective  
 22 attorneys that the remaining deadlines in the operative scheduling order in this matter, ECF No.  
 23 26, be extended 30 days. This is the third extension of time requested for this matter. The first was  
 24 an extension of time for Defendant to answer or otherwise respond to Plaintiff’s Complaint, *see*  
 25 ECF Nos. 8, 9, and the second was a 90-day extension of time to enable the Parties to engage in  
 26 further settlement discussions as well as complete fact witness depositions, expert disclosures and  
 27 discovery, and to file for class certification. ECF Nos. 23, 26. Due to the holidays, the Parties

1 encountered delays beyond their control in scheduling depositions and, accordingly, request that  
 2 the following deadlines be extended by 30 days as follows

3 <b>Deadline</b>	<b>Doc. No. 26</b>	<b>30-day extension</b>
4 Depositions Completed by	1/12/2023	2/13/2023
5 All Expert Discovery Completed by	1/12/2023	2/13/2023
Motion for Class Certification Heard by	3/16/2023	4/17/2023

6 Good cause exists for the above-proposed extension to allow the Parties to complete  
 7 discovery given delays caused by witness availability over the holidays. This short extension will  
 8 not prejudice either Party or substantially delay the resolution of this matter.

9 This document is being electronically filed though the Court's ECF system. In this regard,  
 10 counsel for Plaintiff hereby attests that (1) the content of this Stipulation is acceptable to all persons  
 11 required to sign the document; (2) Defendant's counsel has concurred with the filing of this  
 12 Stipulation with her signature below; and (3) a record supporting this concurrence is available for  
 13 inspection or production if so ordered.

14  
 15 Dated: January 13, 2023

Dated: January 13, 2023

16 By: /s/ Samuel J. Strauss

By: /s/ Amy L. Pierce

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7  
8 *Attorneys for Plaintiff and the*  
9 *Proposed Class*

10 ORDER

11 The court extends deadlines as follows:

12 <b>Deadline</b>	<b>Doc. No. 26</b>	<b>30-day extension</b>
13 Depositions Completed by	1/12/2023	2/13/2023
All Expert Discovery Completed by	1/12/2023	2/13/2023
Motion for Class Certification Heard by	3/16/2023	4/28/2023

14 IT IS SO ORDERED.

15 DATED: January 13, 2023.

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19 CHIEF UNITED STATES DISTRICT JUDGE  
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