

BUCHALTER

A Professional Corporation

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Attorneys for Defendant TESLA, INC.

UNITED STATES DISTRICT COURT**EASTERN DISTRICT OF CALIFORNIA**

NATALIE P. SARE, Personal
Representative of the ESTATE OF
GARY PETE MARCHI,

Plaintiff,

vs.

TESLA, INC. a Delaware Corporation,
dba TESLA MOTORS, INC. and DOES 1
to 25, inclusive,

Defendants.

Case No. 2:22-cv-00547-JAM-CKD
Assigned to: Honorable John A. Mendez

**STIPULATION FOR LEAVE TO
EXTEND TIME TO FILE A JOINT
STATUS REPORT**

The Court's Joint Status Report states that within sixty days of the date of removal, "the parties shall confer as required by Fed. R. Civ. P. 26(f) and shall prepare and submit to the Court a joint status report that includes the Rule 26(f) discovery plan." Defendant Tesla, Inc. ("Tesla") filed its Notice of Removal on March 24, 2022, and the deadline to submit a joint status report is currently May 23, 2022. However, the hearing on Plaintiff's Motion to Remand is June 7, 2022. That being so, the parties respectfully request leave to submit the Joint Status Report no later than July 1, 2022, after the Court rules on Plaintiff's Motion to Remand.

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DATED: May 5, 2022

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A Professional Corporation

By: /s/ Michael A. Preciado
GARY A. WOLENSKY
MICHAEL A. PRECIADO
BREE OSWALD
Attorneys for Defendant
TESLA, INC.

DATED: May 5, 2022

MLG, APLC

By: /s/ Matthew Van Fleet
JONATHAN A. MICHAELS
MATTHEW VAN FLEET
Attorneys for Plaintiff
NATALIE P. SARE, Personal Representative of
the Estate of Gary Pete Marchi

**PURSUANT TO STIPULATION, THE NEW SCHEDULE IS
ADOPTED. IT IS SO ORDERED:**

DATED: May 5, 2022

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