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

MORAYO OREKOYA, individually  
 and on behalf of similarly situated  
 employees

Plaintiff

vs.

H2 MARKETING CONSULTANTS  
 LLC, HEATHER HELLMANN

Defendants.

Case No. 2:22-CV-01155-AC

**STIPULATION AND ORDER TO  
 EXTEND TIME FOR DEFENDANTS  
 H2 MARKETING CONSULTANTS  
 LLC AND HEATHER HELLMANN  
 TO FILE AN ANSWER OR  
 OTHERWISE RESPOND TO  
 PLAINTIFF’S INITIAL COMPLAINT**

Judge: Hon. Allison Claire  
 Dept.: 26

Complaint Filed: July 1, 2022  
 Trial Date: TBD

1 Plaintiff Morayo Orekoya (“Plaintiff”) and Defendants H2 Marketing  
2 Consultants LLC and Heather Hellmann (collectively “Defendants”) by and through  
3 their undersigned counsel of record, hereby stipulate and request that Defendants  
4 receive an extension to file and serve a response to Plaintiff’s initial Complaint on or  
5 before January 31, 2023.

6 Local Rule 144(a) states, “[u]nless the filing date has been set by order of the  
7 Court, an initial stipulation extending the time for no more than twenty-eight (28) days  
8 to respond to a complaint [...] may be filed without approval of the Court if the  
9 stipulation is signed on behalf of all parties who have appeared in the action and are  
10 affected by the stipulation. All other extensions of time must be approved by the  
11 Court. No open extensions of time by stipulation of the parties will be recognized.”

12 Plaintiff commenced the above-entitled action by filing a complaint  
13 (“Complaint”) on or about July 1, 2022. Plaintiff served the Complaint on Defendants  
14 on or about November 15, 2022. After being served with the complaint, Defendants  
15 requested, and Plaintiffs agreed to, additional time to retain counsel, have that counsel  
16 evaluate the claims asserted in Plaintiff’s Complaint, and to respond to Plaintiff’s  
17 Complaint.

18 Defendants retained counsel earlier this year to evaluate the claims asserted in  
19 Plaintiff’s Complaint. Counsel for Defendants is concurrently filing an Appearance  
20 of Counsel in the above-entitled matter. Further, Plaintiff and Defendant are currently  
21 engaging in discussions as to the claims and defenses in this matter for purposes,  
22 including, but not limited to, settlement. In these discussions, counsel for Defendants  
23 requested, and counsel for Plaintiff consented, to additional time to for Defendants to  
24 respond to Plaintiff’s Complaint.

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1 Plaintiff and Defendants stipulate and request that this Court allow Defendants  
2 to respond to Plaintiff's Complaint on or before January 31, 2023.

3  
4 Dated: January 19, 2023

HAHN LOESER & PARKS LLP

5  
6 By: /s/Brent M. Douglas  
7 Brent M. Douglas  
8 Attorney for Defendants  
9 H2 Marketing Consultants LLC and  
Heather Hellmann

10 Dated: January 19, 2023

CLAYEO C. ARNOLD, A PROFESSIONAL  
LAW CORPORATION

11  
12  
13 By: /s/Joshua H. Watson (as authorized on 01/18/23)  
14 Joshua H. Watson  
15 Attorney for Plaintiff Morayo Orekoya

16 **ORDER**

17 IT IS HEREBY ORDERED that Defendants H2 Marketing Consultants LLC  
18 and Heather Hellmann have until January 31, 2023, to answer or otherwise respond to  
19 Plaintiff Morayo Orekoya's initial Complaint in this action.

20  
21 DATED: January 19, 2023

  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE

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