

1 DAVID A. LOWE (SBN: 178811)
dal@rezlaw.com
2 MICHELLE G. LEE (SBN: 266167)
mgl@rezlaw.com
3 ZOË DEGEER (SBN: 298698)
zrd@rezlaw.com
4 RUDY, EXELROD, ZIEFF & LOWE, LLP
5 351 California Street, Suite 700
San Francisco, CA 94104
6 Telephone: (415) 434-9800
Facsimile: (415) 434-0513
7

8 *Attorneys for Plaintiff*
ESTELLE MCGECHIE
9

10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12

13 ESTELLE MCGECHIE,
14 Plaintiff,
15 vs.
16 ATOMOS LIMITED, DOES 1 through 20,
inclusive,
17 Defendants.
18

Case No. 2:22-cv-01812-TLN-DB

**JOINT STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE
PLAINTIFF'S OPPOSITION AND
DEFENDANT'S REPLY TO ATOMOS
LIMITED'S MOTION TO DISMISS FOR
FORUM NON CONVENIENS**

/

20
21
22
23
24
25
26
27
28

STIPULATION

WHEREAS on November 14, 2022, Defendant Atomos Limited filed a Motion to Dismiss for Forum Non Conveniens;

WHEREAS on November 15, 2022, the Court entered a Minute Order stating that, “On the Court’s own motion, Defendant’s Motion to Dismiss for Forum Non Conveniens (ECF No. [11]) is hereby submitted without oral argument. Accordingly, the hearing set for 12/15/22 is VACATED;”

8 WHEREAS the Court in its Minute Order further stated that "Plaintiff shall file an
9 opposition or statement of non-opposition pursuant to Amended Local Rule 230(c), and
10 Defendant may file a reply brief in accordance with Amended Local Rule 230(d)";

11 WHEREAS pursuant to Local Rule 230(c) and (d), the deadline for Plaintiff's opposition
12 was November 28, 2022, and for Defendant's reply was December 8, 2022;

13 WHEREAS the parties agreed to extend these deadlines given the Thanksgiving holiday
14 and time necessary to address the issues presented in Defendant's motion;

15 NOW THEREFORE, the parties, through their counsel of record, stipulate and request
16 that the Court extend the deadline for Plaintiff to file an opposition to the motion to December 8,
17 2022, and for Defendant to file a reply to December 19, 2022.

18 | DATED: November 18, 2022

Respectfully submitted,

RUDY, EXELROD, ZIEFF & LOWE, LLP

By: /s/ Michelle G. Lee
MICHELLE G. LEE
Attorneys for Plaintiff Estelle McGechie

23 | DATED: November 18, 2022

HIRSCHFELD KRAEMER LLP

By: /s/ Jesse D. Sutz
JESSE D. SUTZ
Attorneys for Defendant Atomos Limited

ECF ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), the filer attests that concurrence in the filing of this document has been obtained from each of the other signatories thereto.

Executed this 18th day of November 2022, at San Francisco, California.

/s/ Michelle G. Lee
MICHELLE G. LEE

RUDY EXELROD ZIEFF & LOWE LLP

351 CALIFORNIA STREET, SUITE 700
SAN FRANCISCO, CALIFORNIA 94104
PH (415) 434-9800 | FX (415) 434-0513 | www.rezlaw.com

ORDER

2 The Court, having considered the stipulation of the parties, and their request for extension
3 of time, hereby ORDERS that Plaintiff shall file an opposition no later than December 8, 2022,
4 and Defendant shall file a reply no later than December 19, 2022.

DATED: November 21, 2022

Troy L. Nunley
United States District Judge

RUDY EXELROD ZIEFF & LOWE LLP

351 CALIFORNIA STREET, SUITE 700
SAN FRANCISCO, CALIFORNIA 94104
PH (415) 434-9800 | FX (415) 434-0513 | www.rezlaw.com