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9 Attorneys for Plaintiff RABO AGRIFINANCE, LLC,
 10 a Delaware limited liability company

11 **UNITED STATES DISTRICT COURT**
 12 **EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

13 RABO AGRIFINANCE LLC, a Delaware
 14 limited liability company,
 15
 16 Plaintiff,

Case No. 2:24-CV-01392-CKD

**STIPULATION FOR PLAINTIFF TO
 FILE FIRST AMENDED COMPLAINT
 AND ORDER THEREON**

17 v.

18 SUKHAJ PAMMA, an individual; JASMIN
 19 PAMMA, an individual; IMPERIAL
 20 ORCHARDS, LLC, a California limited
 21 liability company; SUTTER BUTTES
 22 MERCANTILE LLC, a California limited
 23 liability company; SHINDA UPPLE, an
 24 individual; AJMAIL SANGHA, an individual;
 25 VCRAF AGIS CALIFORNIA NUTS LLC, a
 26 Delaare limited liability company; and MAY
 27 AVENUE INVESTMENTS,
 28
 Defendants.

Plaintiff Rabo Agrifinance LLC (“Plaintiff”) and Defendants Sukhraj Pamma (“Mr. Pamma”), Jasmin Pamma (“Ms. Pamma”), Imperial Orchards, LLC (“Imperial”), Sutter Buttes Mercantile LLC (“Sutter”), Shinda Upple (“Ms. Upple”), Ajmail Sangha (“Mr. Sangha”), VCRAF Agis California Nuts LLC (“VCRAF”) and May Avenue Investment (“May Avenue”) (collectively, “Defendants”), by and through their respective counsel of record, respectfully submit the following Stipulation for Plaintiffsto File First Amended Complaint

1 and Proposed Order Thereon pursuant to Federal Rule of Civil Procedure 15 and Local Rules 143,
2 200 and 220.

3 **I. RECITALS**

4 WHEREAS, on May 15, 2024, Plaintiff filed its complaint in the United States
5 District Court, Eastern District of California for judicial foreclosure, damages, and other
6 relief (ECF No. 1) (the “Complaint”).

7 WHEREAS, on June 27, 2024, Mr. Pamma, Ms. Pamma, Imperial, Sutter, Ms.
8 Upple, and Mr. Sangha filed their answer to the Complaint (ECF No. 12).

9 WHEREAS, on July 9, 2024, VCRAF filed its answer to the Complaint (ECF No.
10 14).

11 WHEREAS, on August 29, 2024, Plaintiff obtained new counsel of record (ECF No.
12 21).

13 WHEREAS, based on their investigation, Plaintiff’s new counsel of record feels the
14 issues currently before the Court can be streamlined to better utilize the parties’ and the
15 Court’s valuable time and resources.

16 WHEREAS, Plaintiff now wishes to file a First Amended Complaint in order to
17 dismiss, without prejudice, the Twenty-First, Twenty-Second, Twenty-Third, Twenty-
18 Fourth, Twenty-Fifth, and Twenty-Sixth causes of action in the Complaint. A true and
19 accurate copy of the proposed First Amended Complaint with exhibits and revised civil
20 cover sheet is attached hereto as **Exhibit “A”**. Good cause exists for Plaintiff to be
21 permitted to file this amended pleading because the need to dismiss the aforementioned
22 causes of action without prejudice was not confirmed until Plaintiff had obtained new
23 counsel and Plaintiff’s new counsel had time to review additional documentation pertaining
24 to this litigation. Further, the Defendants will not be prejudiced by the amendment, and leave
25 to amend must be freely given when justice so requires. (Fed. Rules Civ. Proc. Rule 15).

26 Accordingly, Plaintiff and Defendants desire to enter into this Stipulation and Order upon
27 the terms and conditions contained herein.

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II. STIPULATION

THEREFORE, Plaintiff and Defendants, by and through their respective counsel of record, hereby stipulate and agree and request that the Court order that:

1. Plaintiffs may file their First Amended Complaint in the form attached as **Exhibit “A”** to this Stipulation.

IT IS SO STIPULATED.

Respectfully submitted,

FENNEMORE DOWLING AARON

DATED: March 11, 2025

By: /s/
J. JACKSON WASTE

Attorneys for Plaintiff RABO
AGRIFINANCE, LLC

LOEB & LOEB LLP

DATED: March 11, 2025

By: /s/
BERNARD R. GIVEN II

Attorneys for Defendants SUKHRAG
PAMMA, JAISMIN PAMMA,
IMPERIAL ORCHARDS, LLC,
SUTTER BUTTES MERCANTILE,
LLC, SHINDA UPPLA, and AJMAIL
SANGHA

HERUM CRABTREE SUNTANG

DATED: March 11, 2025

By: /s/
JEANNE M. ZOLEZZI

Attorneys for Defendant VCRAF AGIS
CALIFORNIA NUTS, LLC

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ORDER

Based on the foregoing Stipulation, and good cause appearing, it is hereby ordered that:

1. Plaintiff may file their First Amended Complaint in the form attached as **Exhibit “A”** to this Stipulation.

IT IS SO ORDERED.

DATED this 11th day of March, 2025.

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE