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5 Attorneys for Defendant
 6 EMERGY INC. d/b/a MEATI FOODS

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 8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

11 SERENA CALDEIRA, an individual,
 12 Plaintiff,
 13 v.
 14 EMERGY INC. doing business as MEATI
 15 FOODS, and DOES 1 through 100, inclusive,
 16 Defendant.

Case No. 2:24-cv-01775-DJC-JDP
 Hon. Daniel J. Calabretta
 Courtroom 10

**FOURTH JOINT STIPULATION AND
 ORDER TO EXTEND DEFENDANT’S
 TIME TO RESPOND TO COMPLAINT**

Complaint Filed: June 24, 2024
 Current Response Date: Oct. 24, 2024
 New Response Date: Nov. 25, 2024

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1 **IT IS HEREBY STIPULATED AND AGREED**, pursuant to Local Rules 143-144, by
2 and between Plaintiff Serena Caldeira (“Plaintiff”) and Defendant Emery Inc. d/b/a Meati Foods
3 (“Defendant”) (collectively the “Parties”), to extend Defendant’s deadline to respond to
4 Plaintiff’s Complaint, as follows:

5 WHEREAS, Plaintiff filed the instant Complaint on June 24, 2024;

6 WHEREAS, Plaintiff served the Summons and Complaint on Defendant on July 9, 2024
7 and Defendant’s deadline to respond was July 30, 2024;

8 WHEREAS, on July 29, 2024, the Parties stipulated to extend the time for Defendant to
9 respond to the Complaint by 28 days to August 27, 2024 (Dkt. No. 7);

10 WHEREAS, on August 26, 2024, the Parties stipulated to extend the time for Defendant to
11 respond to the Complaint by 30 days to September 26, 2024 (Dkt. No. 8);

12 WHEREAS, on September 24, 2024, the Parties stipulated to extend the time for Defendant
13 to respond to the Complaint by 28 days to October 24, 2024 (Dkt. No. 12);

14 WHEREAS, on September 27, 2024, the Court ordered that Defendant’s deadline to
15 respond to the Complaint is extended to October 24, 2024 (Dkt. No. 15);

16 WHEREAS, to allow Defendant to further investigate Plaintiff’s claims and for the Parties
17 to explore early resolution, Defendant requests additional time to respond to Plaintiff’s Complaint;

18 WHEREAS, counsel for the Parties have met and conferred and agreed to extend
19 Defendant’s deadline to respond to Plaintiff’s Complaint by 32 days from October 24, 2024 to
20 November 25, 2024;

21 WHEREAS, this request is made in good faith and not for the purposes of delay, but for
22 judicial and party efficiency;

23 WHEREAS, the requested extension will not alter the date of any event or any deadline
24 already fixed by Court order; and

25 WHEREAS, this is the fourth request for extension.

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1 **THEREFORE, IT IS HEREBY STIPULATED**, pending the approval of this Court,
2 that Defendant has an extension of time to respond to the Complaint to and including November
3 25, 2024.

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5 Dated: October 23, 2024

FAEGRE DRINKER BIDDLE & REATH LLP

6 By: /s/ Whitney A. Thompson
7 WHITNEY A. THOMPSON
8 Attorneys for Defendant

9 EMERGY INC. d/b/a MEATI FOODS

10 Dated: October 23, 2024

FRANK SIMS & STOLPER LLP

11 By: /s/ Jason M. Frank
12 JASON M. FRANK
13 SCOTT H. SIMS
14 ANDREW D. STOLPER

15 Attorneys for Plaintiff
16 SERENA CALDEIRA
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ATTESTATION

I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: October 23, 2024

/s/ Whitney Thompson
Whitney Thompson

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ORDER

IT IS HEREBY ORDERED THAT:

Pursuant to the Parties' Fourth Joint Stipulation, Defendant's deadline to respond to Plaintiff's Complaint is extended to November 25, 2024. The Court will not consider any further requests for extension of time absent good cause.

IT IS SO ORDERED.

Dated: October 23, 2024

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE