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 10 DONALD R. MEALING, LYNN R. HASNEY
 11 and INC. FUNDAMENTALS

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 SAN FRANCISCO DIVISION

15 ELENA DEL CAMPO, *et al.* on behalf of themselves
 16 and all others similarly situated,

Case No. C01-21151 SI

17 Plaintiffs,

**DEFENDANTS' UNOPPOSED
 MOTION FOR EXTENSION OF
 TIME TO FILE REPLY BRIEFS**

18 v.

19 AMERICAN CORRECTIVE COUNSELING
 20 SERVICES, INC., *et al.*,

**Hearing: February 28, 2014
 Time: 9:00 a.m.
 Courtroom: 10**

21 Defendants.

22 Defendants Don Mealing, Lynn Hasney and Inc. Fundamentals, by and through
 23 counsel, Godfrey Johnson, P.C., hereby submit their Unopposed Motion for Extension of
 24 Time to File Reply Briefs, showing the Court as follows:

25 1. Undersigned counsel certifies that she has conferred with counsel for Plaintiffs
 26 who takes no position on the relief requested herein.

27 2. Pursuant to the Civil Pretrial Minutes issued by the Court on December 19, 2013
 28 (Doc. No. 1345), dispositive motions and Defendants' motion to decertify were due on

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1 January 24, 2014, responses were due on February 7, 2014, and replies are due on February
2 14, 2014.

3 3. Because of the Court's ECF technical failure on January, 24, 2014, Defendants
4 filed their motions on the next court date following the ECF technical failure on January 27,
5 2014 pursuant to the local rules.

6 4. While there was not a second technical failure, Plaintiffs filed their responses to
7 Defendants' motions on February 10, 2014.

8 5. Defendants therefore respectfully request that their time to reply to Plaintiffs'
9 responses be extended for the same period of time taken by Plaintiffs, making their replies on
10 their motion for summary judgment and motion to decertify due on February 18, 2014.
11

12 6. In the alternative, Defendants would request that Plaintiffs' responses be stricken
13 as untimely as their late filing would greatly prejudice Defendants, especially in light of the
14 expedited briefing schedule, complexity of the briefed issues, and the volume of exhibits
15 attached to Plaintiffs' responses.
16

17 WHEREFORE, Defendants respectfully request a brief extension of time to file their
18 reply briefs, up to and including February 18, 2014.
19

20 Dated this 12th day of February, 2014.
21

22 /s/ Julie N. Richards
23 Julie N. Richards
24 Attorneys for Defendants
25 Donald R. Mealing, Lynn R. Hasney, and
26 Inc. Fundamentals

IT IS SO ORDERED

27 ~~Susan Histon, Judge~~ EDWARD M. CHEN
UNITED STATES DISTRICT JUDGE

28 2/18/2014
Date