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 9 EL CENTRO FOODS, INC.

10 **UNITED STATES DISTRICT COURT**
 11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

12 EL CENTRO FOODS, INC., a
 13 California Corporation,

14 Plaintiff,

15 vs.

16 FOOD ALL THE TIME, INC., dba Mr.)
 17 Pizza Man, VICTOR M. PEREZ, an)
 18 individual, RAYMOND KLEIN, an)
 19 individual and DOES 1-10,)

20 Defendants.)
 21)
 22)
 23)
 24)
 25)
 26)
 27)
 28)

) **Case No.: CV 09-04106 MEJ**
)
) **STIPULATION TO EXTEND TIME**
) **TO FILE JOINT CASE**
) **MANAGEMENT STATEMENT**
) **AND CONTINUE CASE**
) **MANAGEMENT CONFERENCE;**
) ~~**PROPOSED**~~ **ORDER THEREON**

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1 WHEREAS, El Centro Foods, Inc., Food All The Time, Inc. dba Mr. Pizza Man,
2 Victor Perez, and Raymond Klein (collectively “parties”) executed a settlement
3 agreement, but consideration for the settlement was not timely received and was returned
4 for insufficient funds.

5 WHEREAS, the Court granted Plaintiff’s request to place the matter back on
6 active calendar, ordered a Joint Case Management Statement to be filed by October 30,
7 2014, and calendared a Case Management Conference on November 6, 2014, at 10:00
8 a.m.

9 WHEREAS, the Court granted parties’ request to extend the submission deadline
10 for the Joint Case Management Statement to January 7, 2016, and continue the Case
11 Management Conference to January 14, 2016, at 10:00 a.m.

12 WHEREAS, the parties continue to engage in good faith discussions to possibly
13 resolve this matter and not to unnecessarily cause delay with the Court, the parties request
14 the Court to extend the deadline to file the Joint Case Management Statement and to
15 continue the Case Management Conference;

16 THEREFORE the parties, by and through their respective attorneys, hereby
17 stipulate, subject to the approval of the Court, to extend the submission deadline for the
18 Joint Case Management Statement to March 10, 2016, and continue the Case Management
19 Conference to March 17, 2016.

20
21 Dated: January 7, 2016

22 /s/ Milord A. Keshishian
23 Milord A. Keshishian, Esq.
24 MILORD & ASSOCIATES, P.C.
25 ***Attorneys for Plaintiff***
26 ***El Centro Foods, Inc.***

22 /s/ Otto Lee
23 Otto Lee, Esq.
24 INTELLECUTAL PROPERTY LAW GROUP, LLP
25 ***Attorneys for Defendants***
26 ***Food All the Time, Inc., Victor Perez, and***
27 ***Raymond Klein***

Attestation Pursuant to L.R. 5-1

I hereby 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: January 7, 2016

/s/ Milord A. Keshishian

Milord A. Keshishian

Dated: January 8, 2016

So Ordered:



United States Magistrate Judge

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