

1 MARGARET J. GROVER (112701)  
 mgrover@kmtg.com  
 2 KRONICK, MOSKOVITZ, TIEDEMANN  
 & GIRARD  
 3 1350 Treat Boulevard, Suite 105  
 Walnut Creek, CA 94597  
 4 Telephone: (925) 395-2380  
 Facsimile: (925) 395-2381  
 5  
 6 Attorneys for Defendant Clara Mo, also  
 known as Wen-Juan Pan

7  
 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

11 CRAIG YATES, an individual,  
 12 Plaintiff,  
 13 v.  
 14 ROBERT C. LEE; CHUN-NEW  
 PAN; YU CHING PAN; WEN-  
 15 JUAN PAN; WEN-JU PAN; WEN-  
 ZUNG PAN, a.k.a. ELITE  
 16 SANDWICH COMPANY and NEW  
 WORLD TOUR & TRAVELS,  
 17 Defendants.  
 18

CASE NO. CV-10-4752-EMC  
**STIPULATION EXTENDING TIME  
 FOR DEFENDANT CLARA MO,  
 ALSO KNOWN AS WEN-JUAN  
 PAN, TO RESPOND TO  
 COMPLAINT AND [PROPOSED]  
 ORDER THEREON**

19 WHEREAS the parties are engaging in good faith settlement discussions; and  
 20 WHEREAS the response of Defendant Clara Mo, also known as Wen-Juan  
 21 Pan, is due to be filed on or before May 31, 2011; and,

22 WHEREAS the parties desire to direct their efforts to resolution without  
 23 incurring additional legal fees;

24 NOW THEREFOR, IT IS HEREBY STIPULATED, by and between the  
 25 parties hereto, through their respective attorneys of record, that Defendant Clara  
 26 Mo, also known as Wen-Juan Pan may have an additional period of 21  
 27 (Twenty-One) Days within which to respond to the Complaint in the above-  
 28

1 captioned matter. Ms. Mo's responsive pleading will now be due on or before  
2 June 20, 2011.

3

4 Dated: May 31, 2011

KRONICK, MOSKOVITZ, TIEDEMANN &  
GIRARD  
A Law Corporation

5

6

7

By: Margaret J. Grover  
Margaret J. Grover  
Attorneys for Defendant  
Clara Mo, also known as Wen-Juan Pan

8

9

10

11 Dated: May \_\_\_\_\_, 2011

THOMAS E. FRANKOVICH  
A Professional Law Corporation

12

13

14

By: \_\_\_\_\_  
Thomas E. Frankovich  
Attorney for Plaintiff  
Craig Yates

15

16

17

18

19

IT IS SO ORDERED that Defendant Clara Mo's responsive Pleading is now  
due on or before June 20, 2011.

20

21

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Edward M. Chen  
United States Magistrate Judge

22

23

24

25

26

27

28

1 captioned matter. Ms. Mo's responsive pleading will now be due on or before  
2 June 20, 2011.

3  
4 Dated: May 31, 2011

KRONICK, MOSKOVITZ, TIEDEMANN &  
GIRARD  
A Law Corporation

5  
6  
7 By: Margaret J. Grover  
Margaret J. Grover  
Attorneys for Defendant  
Clara Mo, also known as Wen-Juan Pan

8  
9  
10 Dated: May 31, 2011

THOMAS E. FRANKOVICH  
A Professional Law Corporation

11  
12  
13 By: Thomas E. Frankovich  
Thomas E. Frankovich  
Attorney for Plaintiff  
Craig Yates

14  
15  
16  
17  
18 IT IS SO ORDERED that Defendant Clara Mo's responsive Pleading is now  
19 due on or before June 20, 2011.

20  
21 Dated: June 1, 2011

