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PENSION TRUST FUND

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13 Attorneys for Plaintiffs
JENNIFER LONNBERG TOLE &
CURTIS LONNBERG

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 JENNIFER LONNBERG TOLE, an
19 individual; CURTIS LONNBERG, an
20 individual

21 Plaintiffs,

22 vs.

23 WESTERN CONFERENCE OF
24 TEAMSTERS PENSION TRUST FUND, an
employer employee jointly administered
25 pension plan; STACY CHRISTINE
LONNBERG, an individual; and DOES 1 to
26 25, inclusive,

27 Defendants.

Case No. 3:15-cv-00044-EMC

**STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT ; ORDER**

(Superior Court of the State of California,
County of San Mateo, Case No. CIV 531469)

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STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT; Case No. 3:15-cv-00044-EMC

1 This stipulation is entered into by and among plaintiffs JENNIFER LONNBERG TOLE
2 and CURTIS LONNBERG (“Plaintiffs”) and defendant THE WESTERN CONFERENCE OF
3 TEAMSTERS PENSION TRUST FUND (the “Trust”) (Plaintiffs and the Trust collectively the
4 “Parties”), by and through their respective counsel.

5 WHEREAS, Plaintiffs filed their Complaint in the above-entitled action in the Superior
6 Court of California, County of Santa Clara, on November 24, 2014, and personally served the Trust
7 with the Complaint on December 11, 2014;

8 WHEREAS, the Trust timely removed this action from the Superior Court of California,
9 County of San Mateo, to the United States District Court for the Northern District of California on
10 January 6, 2015;

11 WHEREAS, pursuant to the stipulation of the Parties, the Trust’s present deadline to
12 respond to the Complaint is February 13, 2015;

13 WHEREAS, Defendant Stacy Christine Lonngberg has not responded to the Complaint or to
14 multiple attempts by Plaintiffs’ counsel to communicate with her regarding her failure to respond;

15 WHEREAS, Plaintiffs intend to apply in short order to the court for entry of default
16 judgment against Stacy Christine Lonngberg;

17 WHEREAS, entry of default judgment against Stacy Christine Lonngberg could resolve
18 many issues in this case as they relate to Plaintiffs’ claim against the Trust;

19 WHEREAS, the Parties thus believe that delaying the Trust’s time to respond to the
20 Complaint until after Plaintiffs’ motion for entry of default judgment can be heard will both
21 conserve judicial resources and spare the Parties from incurring needless expense;

22 WHEREAS, under Civil Local Rule 6-1(a), the parties may stipulate in writing without a
23 court order to extend the time within which to answer or otherwise respond to a complaint provided
24 that change will not alter the date of any event or any deadline already fixed by Court order;

25 WHEREAS, extending the date for the Trust to respond to the Complaint as set forth below
26 will not alter the date of any event or deadline already fixed by a order of the Court;

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1 NOW THEREFORE, the Parties hereby stipulate and agree as follows:

2 1. The Trust's deadline to respond to Plaintiffs' Complaint shall be extended sixty
3 days, to and including April 14, 2015.

4 IT IS SO STIPULATED.

6 DATED: February 10, 2015

TRUCKER ♦ HUSS

8 By: /s/ Sean T. Strauss
Robert F. Schwartz
Sean T. Strauss
Attorneys for Defendant
WESTERN CONFERENCE OF TEAMSTERS
PENSION TRUST FUND

11 DATED: February 10, 2015

LAW OFFICES OF LERNER & WEISS, APC

13 By: /s/ Leonard D. Lerner
Leonard D. Lerner, Esq.
Attorneys for PLAINTIFFS
STACY CHRISTINE LONNBERG &
CURTIS LONNBERG

17 I attest that my firm has obtained Mr. Lerner's concurrence in the filing of this document.

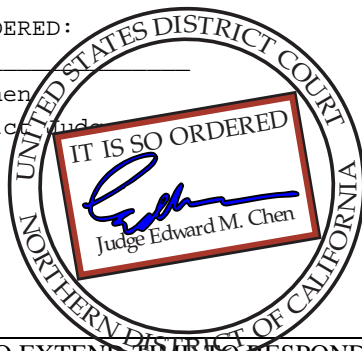
18 DATED: February 10, 2015

TRUCKER ♦ HUSS

20 By: /s/ Sean T. Strauss
Robert F. Schwartz
Sean T. Strauss
Attorneys for Defendant
WESTERN CONFERENCE OF TEAMSTERS
PENSION TRUST FUND

24 IT IS SO ORDERED:

25 _____
Edward M. Chen
26 U. S. District Judge



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CERTIFICATE OF SERVICE

I, Michael V. Bresso, declare as follows:

I am a citizen of the United States, over the age of eighteen years and not a party to the within action. I am employed in the City and County of San Francisco, California. My business address is One Embarcadero Center, 12th Floor, San Francisco, California 94111. On the date indicated below, I served the within:

STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT

to the addressee(s) and in the manner indicated below:

Leonard D. Lerner, Esq.
Law Offices of Lerner & Weiss, APC
21600 Oxnard St., Ste. 1130
Woodland Hills, CA 91367

Stacy Christine Lonnberg
CDCR #WE8010
Central California Women's Facility
P.O. Box 1508
Chowchilla, CA 93610



BY MAIL: I placed a true copy in a sealed envelope addressed as indicated above, on the above-mentioned date. I am familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I certify under penalty of perjury that the foregoing is true and correct, that the foregoing document(s) were printed on recycled paper, and that this Certificate of Service was executed by me on February 10, 2015, at San Francisco, California.

/s/Michael V. Bresso
Michael V. Bresso