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SEPEHR DAGHIGHIAN, State Bar No. 239349
LAW OFFICES OF SEPEHR DAGHIGHIAN, P.C.
433 North Camden Drive, Fourth Floor
Beverly Hills, California 90210
Telephone: (310) 887-1333
Facsimile: (310) 887-1334
E-mail: sepehr@daghighian.com

Attorney for Defendants:
**ASSET CAPITAL RECOVERY GROUP, LLC,
LAW OFFICES OF KENOSIAN & MIELE, LLP, AND
KENNETH JOHN MIELE**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

STEVEN C. LOUIE,
Plaintiff,

v.

ASSET CAPITAL RECOVERY GROUP,
LLC, LAW OFFICES OF KENOSIAN &
MIELE, LLP, and KENNETH JOHN
MIELE.,
Defendant.

Case No. 3:15-CV-01680-EMC

*Assigned for all reasonable purposes to Courtroom
5, the Honorable Edward M. Chen presiding*

**STIPULATION AND ~~PROPOSED~~ ORDER
EXTENDING DEFENDANTS ASSET
CAPITAL RECOVERY GROUP, LLC,
LAW OFFICES OF KENOSIAN & MIELE,
LLP, AND KENNETH JOHN MIELE'S
TIME TO FILE REPLY BRIEF IN SUPPORT
OF DEFENDANTS' FIRST MOTION TO
DISMISS**

Reply Brief:
Current Due Date: July 1, 2015
Proposed Due Date: July 6, 2015

LAW OFFICES OF SEPEHR DAGHIGHIAN, P.C.
433 NORTH CAMDEN DRIVE, FOURTH FLOOR
BEVERLY HILLS, CALIFORNIA 90210

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 **WHEREAS**, on June 10, 2015, defendants Asset Capital Recovery Group, LLC, a
3 California Limited Liability Company, (hereinafter, “**ACRG**”), the Law Offices of Kenosian &
4 Miele, LLC, a California Limited Liability Company, (hereinafter, “**K&M**”), and Kenneth John
5 Miele, an individual, (hereinafter, “**Mr. Miele**”) (Asset Capital, Kenosian & Miele and Mr. Miele
6 shall hereinafter be collectively referred to as “**Defendants**”) filed their First Motion to Dismiss
7 (dkt. 13) pursuant to Federal Rule of Civil Procedure 12(b)(6) for a dismissal of the Complaint
8 (dkt. 1) filed by plaintiff Steven C. Louie, an individual (hereinafter, “**Plaintiff**”) on April 13,
9 2015 (Defendants and Plaintiff shall hereinafter each be collectively referred to as the “**Parties**”);

10 **WHEREAS**, the Court originally set Plaintiff’s deadline to file an Opposition brief to
11 Defendants’ First Motion to Dismiss as June 24, 2015, and set Defendants’ deadline to file a
12 Reply brief in support of the First Motion to Dismiss as July 1, 2015;

13 **WHEREAS**, on June 10, 2015, Defendants filed a Declination to Proceed Before a U.S.
14 Magistrate Judge (dkt. 12);

15 **WHEREAS**, on June 12, 2015, the Court thus entered an Oder (dkt. 16) reassigning this
16 case for all further proceedings to the Honorable Judge Edward M. Chen;

17 **WHEREAS**, as a result of the Court’s June 12, 2015 Order (dkt. 16), Defendants re-
18 noticed the hearing date for their First Motion to Dismiss (dkt. 13), and scheduled the hearing
19 date as July 23, 2015 (dkt. 17);

20 **WHEREAS**, the Court consequently set Plaintiff’s deadline to file an Opposition brief to
21 Defendants’ First Motion to Dismiss as June 26, 2015, yet left Defendants’ deadline to file a
22 Reply brief in support of the First Motion to Dismiss as July 1, 2015;

23 **AND WHEREAS**, counsel for Defendants is traveling throughout the entire week of June
24 29, 2015, and is not scheduled to return until July 5, 2015;

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IT IS HEREBY STIPULATED, by and between the Parties that Defendants’ deadline to file a Reply brief in support of Defendants’ First Motion to Dismiss (dkt. 13) shall be continued from July 1, 2015 to and including July 6, 2015.

IT IS SO STIPULATED.

Respectfully submitted,
JAMES A. MICHEL

Dated: June 25, 2015

/s/James A. Michel
James A. Michel
Attorney for Plaintiff: Steven C. Louie

ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3):

Concurrence in the filing of the document has been obtained from each of the other Signatories, which shall serve in lieu of their signatures on the document.

LAW OFFICES OF SEPEHR DAGHIGHIAN, P.C.

Dated: June 25, 2015

/s/Sepehr Daghighian
SEPEHR DAGHIGHIAN, ESQ.
Attorney for Defendants:
Asset Capital Recovery Group, LLC, Law Offices Of Kenosian & Miele, LLP, and Kenneth John Miele

IT IS SO ORDERED.

