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1 ABBEY, WEITZENBERG, WARREN & EMERY MITCHELL B. GREENBERG, Esq., State Bar 114878 100 Stony Point Road, Suite 200 2 Post Office Box 1566 Santa Rosa, CA 95402-1566 3 Telephone: 707-542-5050 Facsimile: 707-542-2589 4 E-Mail: mgreenberg@abbevlaw.com 5 Attorneys for Defendants 6 OLD MEXICO RESTAURANT EAST SIDE, INC., a California Corp. dba OLD MEXICO RESTAURANT; and FERNANDO A. LOPEZ, SR., Successor Trustee 7 of the Lopez Family Trust, dated August 28, 1986 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 IRMA RAMIREZ, Case No.: CV-15 3700 JCS 11 Plaintiffs, STIPULATION TO EXTEND 12 TIME WITHIN WHICH TO **RESPOND TO COMPLAINT** 13 v. (LOCAL RULE 6-1) 14 OLD MEXICO RESTAURANT EAST SIDE, INC., a California Corp., dba OLD MEXICO RESTAURANT; and The Honorable Joseph C. Spero 15 FERNANDO A. LOPEZ, Sr., Successor Trustee of the Lopez Family Trust, dated 16 August 28, 1986, 17 Defendants. 18 Plaintiff IRMA RAMIREZ, on the one hand, and defendants OLD MEXICO 19

RESTAURANT EAST SIDE, INC., a California Corp. dba OLD MEXICO RESTAURANT; and FERNANDO A. LOPEZ, SR., Successor Trustee of the Lopez Family Trust, dated august 28, 1986, on the other hand, through their respective counsel of record, hereby stipulate in accordance with Local Rule 6-1(a) to the following:

1. In compliance with General Order 56, the parties to this action will be scheduling their joint inspection of the premises within the timeframe set forth in this Court's Scheduling Order (Docket #3), and will thereafter begin the process of meeting and conferring to discuss settlement of the claims in this action.

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## ABBEY, WEITZENBERG, WARREN & EMERY, P.C. 100 Stony Point Road, Suite 200, P.O. Box 1566, Santa Rosa, CA 95402-1566 Telephone: (707) 542-5050 Facsimile (707) 542-2589

## ATTESTATION OF CONCURRENCE

I, Mitchell B. Greenberg, as the ECF user and filer of this document, attest that, pursuant to the United States District Court, Northern District Civil Local Rule 5.1(i)(3), concurrence in the filing of this document has been obtained from the above signatories.

Dated: October 7, 2015 ABBEY, WEITZENBERG, WARREN & EMERY

By: /s/ Mitchell B. Greenberg
MITCHELL B. GREENBERG
Attorneys for Defendants
OLD MEXICO RESTAURANT EAST SIDE,
INC., and FERNANDO A. LOPEZ, SR.,
Successor Trustee of the Lopez Family Trust,
dated August 28, 1986

Dated: 10/8/15



## **CERTIFICATE OF SERVICE**

I, Mitchell B. Greenberg, attorney of record for Defendants OLD MEXICO
RESTAURANT EAST SIDE, INC., and FERNANDO A. LOPEZ, SR., Successor
Trustee of the Lopez Family Trust, dated August 28, 1986, I electronically filed the
STIPULATION TO EXTEND TIME WITHIN WHICH TO RESPOND TO
COMPLAINT (LOCAL RULE 6-1) with the Clerk of the Court using the
electronic case filing system, which will send notifications of this filing to all
parties registered with the Court's electronic case filing system.
Dated: October 7, 2015 ABBEY, WEITZENBERG, WARREN & EMERY

By: /s/ Mitchell B. Greenberg MITCHELL B. GREENBERG Attorneys for Defendants
OLD MEXICO RESTAURANT EAST SIDE,
INC., and FERNANDO A. LOPEZ, SR.,
Successor Trustee of the Lopez Family Trust,
dated August 28, 1986