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5 Attorney for Plaintiff  
 IRMA RAMIREZ  
 6

7 **UNITED STATES DISTRICT COURT**  
 8 **NORTHERN DISTRICT OF CALIFORNIA**

9  
 10 IRMA RAMIREZ,  
 11 Plaintiff,

12 v.

13 APENA CORP, a California Corporation  
 dba PLAZA TEQUILA TAQUERIA;  
 14 DEMETRIOS GIANNIS, Trustee and  
 ROSE GIANNIS, Trustee of the Giannis  
 15 Family Trust,  
 16 Defendants..

) CASE NO. 15-cv-03808-EMC  
 )  
 )

) **STIPULATION RE CONTINUING**  
 ) **DEADLINE FOR THE PARTIES TO**  
 ) **CONDUCT THE JOINT SITE**  
 ) **INSPECTION, [PROPOSED] ORDER**  
 ) **THEREON**

17  
 18 Plaintiff and Defendants by and through their respective attorney of record, respectfully  
 19 request and stipulate, as follows:

- 20 1. **Whereas**, defendants have been served with the summons and complaint and  
 21 have answered plaintiff’s complaint;  
 22 2. **Whereas**, pursuant to General Order 56, ¶3,4, the parties are to have the Joint  
 23 Site Inspection at the Plaza Tequila Taqueria, located at/near 19315 Highway 12, Sonoma,  
 24 California, no later than December 3, 2015 . However, due to scheduling conflicts and the holidays,  
 25 the parties are unable to conduct the General Order 56 Joint Site Inspection by the December 3<sup>rd</sup>  
 26 deadline.  
 27 3. **Therefore**, in light of the above, the parties have agreed to reschedule and  
 28 conduct the joint site inspection on December 10, 2015.

1 **IT IS SO STIPULATED.**

2 This stipulation may be executed in counterparts and have the same force and effect as  
3 though all signatures are on the same and/or consecutive pages. Photocopies and facsimile shall  
4 have the same force and effect as originals.

5 Respectfully submitted,

7 Dated: November 24, 2015

THOMAS E. FRANKOVICH, Esq.  
**A PROFESSIONAL LAW CORPORATION**

9 By: /s/ Thomas E. Frankovich  
10 Thomas E. Frankovich  
11 Attorney for Plaintiff IRMA RAMIREZ

12 Dated: November 24, 2015

ATTORNEY AT LAW

14 By: /s/ Marvin Pederson  
15 Marvin Pederson  
16 Attorney for Defendant Apena Corp.

17 Dated: November 24, 2015

DICKENSON, PEATMAN & FOGARTY, P.C.

19 By: /s/Joy Durand  
20 Joy Durand  
21 Attorney for Defendants Demetrios Giannis and  
22 Rose Giannis

**PROPOSED ORDER**

23 **IT IS SO ORDERED**, that the last day for the parties and counsel to conduct the joint site  
24 inspection of the premises be continued up to and including December 10, 2015.

25 Dated: November 25, 2015

