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 8 SAN FRANCISCO BAYKEEPER

9  
 10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA  
 12 OAKLAND DIVISION

13 SAN FRANCISCO BAYKEEPER, a non-profit  
 14 corporation,

15 Plaintiff,

16 v.

17 JAMES F. TAYLOR dba PINOLE RODEO  
 18 AUTO WRECKERS,

19 Defendant.  
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Civil No. 4:15-cv-05825-MEJ

REQUEST TO EXTEND TIME TO  
 22 RESPOND TO COMPLAINT; ~~PROPOSED~~  
 23 ORDER

(Federal Water Pollution Control Act, 33  
 24 U.S.C. § 1251 *et seq.*)

Honorable Maria-Elena James  
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1 WHEREAS, on December 18, 2015, Plaintiff San Francisco Baykeeper (“Plaintiff”) filed the  
2 above-entitled action;

3 WHEREAS, on February 17, 2016, Plaintiff transmitted to Defendant a Request for Waiver of  
4 the Service of Summons;

5 WHEREAS, on March 9, 2016, Plaintiff received Defendant’s executed waiver for service of  
6 summons, and Plaintiff filed the executed waiver for service of summons;

7 WHEREAS, Defendant has chosen to proceed as a *pro se* litigant, and has not appeared in this  
8 matter;

9 WHEREAS, pursuant to Rule 4(d)(3) of the Federal Rules of Civil Procedure, Defendant  
10 currently has until April 18, 2016 to respond to the complaint;

11 WHEREAS, Plaintiff and Defendant (collectively, the “Parties”) have been working together  
12 in good faith to reach a settlement agreement in this action;

13 WHEREAS, the Parties desire to extend the time for Defendant to respond to the complaint  
14 until May 23, 2016;

15 WHEREAS, such an extension of time within which to answer or otherwise respond to the  
16 complaint will not alter the date of any event or any deadline already fixed by Court Order;

17 WHEREAS, Plaintiff requests, upon the Court’s approval, to extend the time for Defendant to  
18 respond to the complaint to May 23, 2016, in order to give the Parties a chance to complete settlement  
19 negotiations;

20 WHEREFORE, Plaintiff respectfully requests the Court to approve and enter the Proposed  
21 Order below.

22  
23 DATE: March 24, 2016

Respectfully Submitted,

24 /s/ Nicole C. Sasaki

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26 Nicole C. Sasaki  
27 Attorneys for Plaintiff  
SAN FRANCISCO BAYKEEPER

~~[PROPOSED]~~ ORDER

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GOOD CAUSE APPEARING,

1. Defendant's time to respond to the complaint shall be extended to May 23, 2016.

IT IS SO ORDERED.

Date: March 24, 2016

NORTHERN DISTRICT OF CALIFORNIA



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Honorable Maria-Elena James  
United States District Court