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6 Attorneys for Defendant
 7 JOE'S UNION L.P.; THE RIVIERA LLC; JAMES A. MACIEL,
 8 JR.; GREGORY A. MACIEL; BARRY MACIEL; PETER R.
 JOHNSON; GAIL A. GAVELLO; CHARLENE MARIE OZAWA;
 and GEORGIA VIERRA

10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**

12 FRANCISCA MORALEZ,

13 Plaintiff,

14 v.

15 JOE'S UNION L.P. dba ORIGINAL JOE'S;
 16 THE RIVIERA LLC; JAMES A. MACIEL,
 17 JR.; GREGORY A. MACIEL, individually
 and as Trustee of the BARRY MACIEL
 TRUST; BARRY MACIEL; PETER R.
 18 JOHNSON, Trustee of the KRISTINA
 GAVELLO MARITAL TRUST; GAIL A.
 GAVELLO, Trustee of the GAIL A.
 19 GAVELLO 2009 REVOCABLE TRUST
 AGREEMENT dated July 2, 2009;
 20 CHARLENE MARIE OZAWA; MIKE
 MICHELETTI; JOYCE JAMES; GEORGIA
 21 VIERRA,

22 Defendants.

Case No. 3:16-cv-06345-TEH

**SECOND STIPULATION TO EXTEND
 TIME FOR DEFENDANTS TO RESPOND
 TO PLAINTIFF'S COMPLAINT**

Old Response Date: December 28, 2016;
 New Response Date: January 30, 2017

Complaint Filed: November 1, 2016
 Trial Date: None
 Judge: Hon. Thelton E. Henderson
 Dept. 12, San Francisco

1 IT IS HEREBY STIPULATED AND AGREED by and between plaintiff Francisca
2 Moralez (“Plaintiff”) and defendants Joe’s Union L.P.; The Riviera LLC; James A. Maciel, Jr.;
3 Gregory A. Maciel; Barry Maciel; Peter R. Johnson; Gail A. Gavello; Charlene Marie Ozawa; and
4 Georgia Vierra (“Defendants”) (collectively, the “Parties”), by and through their respective
5 attorneys of record, as follows:

6 WHEREAS, on November 1, 2016, Plaintiff filed her Complaint in the United States
7 District Court, Northern District of California, Case Number 3:16-cv-06345, alleging three causes
8 of action, including violations of the Americans With Disabilities Act of 1990; Unruh Act; and
9 Denial of Full and Equal Access to Public Facilities;

10 WHEREAS, the Parties previously stipulated to a 30-day extension of the deadline for
11 Defendants to file and serve their responsive pleading, which extended such deadline to December
12 28, 2016, while the Parties explored early resolution of the matter before Defendants spent the
13 necessary time and resources preparing and filing a responsive pleading;

14 WHEREAS, the Parties are currently in the end-stages of settlement negotiations that, if
15 successful, will resolve this matter in its entirety;

16 WHEREAS, Plaintiff and Defendants have stipulated to a second 30-day extension of the
17 deadline for Defendants to file and serve their responsive pleading, which extends such deadline to
18 January 30, 2017, to allow the Parties to continue to negotiate for resolution of the matter in its
19 entirety and prepare and execute settlement documents;

20 WHEREAS, this extension will not alter the date of any event or deadline already fixed by
21 Court order and is made pursuant to Local Rule 6-1(a); and

22 WHEREAS, the Parties agree that this Stipulation and the extension of time for Defendants
23 to respond to the Complaint shall be without prejudice to any claims, defenses or rights that any
24 party may have regarding the Complaint or any other matter in this action.

25 THEREFORE, the Parties hereby stipulate that the deadline for Defendants to file and serve
26 their responsive pleading to Plaintiff’s Complaint shall be continued to January 30, 2017.

27 **IT IS SO STIPULATED.**

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DATED: December 29, 2016

Respectfully submitted,
MOORE LAW FIRM, P.C.

By: /s/ Tanya Moore
Tanya Moore

Attorney for Plaintiff
FRANCISCA MORALES

DATED: December 29, 2016

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

By: /s/ Amber L. Roller
David Raizman
Amber L. Roller

Attorneys for Defendant
JOE'S UNION L.P.; THE RIVIERA LLC;
JAMES A. MACIEL, JR.; GREGORY A.
MACIEL; BARRY MACIEL; PETER R.
JOHNSON; GAIL A. GAVELLO; CHARLENE
MARIE OZAWA; and GEORGIA VIERRA

Certification Pursuant to Local Rule 5-1(i)(3)

Pursuant to Local Rule 5-1(i)(3), I, Amber L. Roller, do attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: December 29, 2016

By: /s/ Amber L. Roller

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CERTIFICATE OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California; I am over the age of 18 years and not a party to this action. My business address is 400 S. Hope Street, Suite 1200, Los Angeles, California 90071.

On December 29, 2016, I served the following document(s) described as:

**SECOND STIPULATION TO EXTEND TIME FOR
DEFENDANTS TO RESPOND TO PLAINTIFF'S
COMPLAINT**

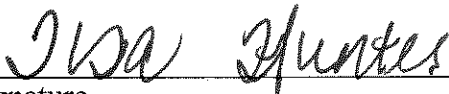
With the Clerk of the United States District Court of Northern District of California, using the CM/ECF System. The Court's CM/ECF System will send an e-mail notification of the foregoing filing to the following parties and counsel of record who are registered with the Court's CM/ECF System:

Tanya E. Moore, Esq. Zachary M. Best, Esq. MOORE LAW FIRM, P.C. 332 North Second Street San Jose, California 95112 Telephone: (408) 298-2000 Facsimile: (408) 298-6046 Email: service@moorelawfirm.com	Attorneys for Plaintiff Francisca Moralez
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(Federal) I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on December 29, 2016, at Los Angeles, California.

Tisa Hunter


Signature

Type or Print Name

* (SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOPE IN MAIL SLOT, BOX OR BAG)