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8 Attorneys for Plaintiff
 Sustainable Ranching Partners, Inc.

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

12 SUSTAINABLE RANCHING PARTNERS,)	Case No.: 17-cv-02323-JST
13 INC.,)	
14 Plaintiff,)	STIPULATION AND PROPOSED ORDER
15 vs.)	RE: EXTENDING DEADLINE TO
16 BERING PACIFIC RANCHES LTD., et al.,)	RESPOND TO DEFENDANTS' MOTION
17 Defendants.)	TO DISMISS AND RESCHEDULING THE
	CASE MANAGEMENT CONFERENCE

18 Plaintiff Sustainable Ranching Partners, Inc. ("Plaintiff") and Defendants Patrick Harvie and
 19 Bering Pacific Ranches Limited (collectively "Defendants"), by and through counsel, stipulate and
 20 agree as follows:

21 WHEREAS, on December 22, 2017, Defendants filed a Motion to Dismiss Plaintiff's
 22 Second Amended Complaint [Dkt. No. 38];

23 WHEREAS, this Court re-scheduled the hearing date on Defendants' Motion to 2:00 p.m. on
 24 February 22, 2018 [Dkt. No. 39];

25 WHEREAS, given the holidays, Plaintiff and Defendants (collectively "Parties") are
 26 amenable to extending the date for Plaintiff to respond to Defendants' Motion to January 16, 2018;

27 WHEREAS, a Case Management Conference is currently scheduled for January 24, 2018
 28 [Dkt. No. 34];

1 WHEREAS, counsel for the Plaintiff has a conflict on January 24, 2018 due to a multi-party
2 mediation;

3 WHEREAS, counsel for Defendant is amenable to rescheduling the Case Management
4 Conference for February 22, 2018, the same day as the hearing on their Motion to Dismiss;

5 WHEREFORE, based on the foregoing, and subject to this Court's approval, the Parties
6 stipulate and agree as follows:

- 7 1. The deadline for Plaintiff to oppose the Motion to Dismiss shall be January 16, 2018;
- 8 2. The Case Management Conference shall be set 2:00 p.m. on February 22, 2018.

9 IT IS SO AGREED.

10 Dated: December 26, 2017

11 MORALES FIERRO & REEVES

TROUTMAN SANDERS LLP

13 By: /s/ William C. Reeves
14 William C. Reeves
14 Attorneys for Plaintiff

By: /s/ Dean A. Morehous
Dean A. Morehous
Attorneys for Defendants

15 Pursuant to Local Rule 5-1, the undersigned attests that counsel for Defendant has consented
16 in the filing of this stipulation.

17 By: /s/ William C. Reeves
18 William C. Reeves


19
20 ORDER

21 The Court, having considered the stipulation of the parties and good cause appearing, orders
22 as follows:

- 23 1. The deadline for Plaintiff to oppose the Motion to Dismiss shall be January 16, 2018;
Replies are due by January 23, 2018.
- 24 2. The Case Management Conference shall be held on February 22, 2018 at 2:00 p.m.

25 IT IS SO ORDERED.

26 Dated: December 27, 2017

27 
28 _____
UNITED STATES DISTRICT JUDGE
HON. JON S. TIGAR