

1 Pursuant to Civil Local Rules 6-2 and 7-12, Defendant Tracey Wapnick (“Wapnick”) and
2 Plaintiff Christopher Hadsell (“Hadsell”), by and through their respective counsel of record, hereby
3 stipulate as follows:

4 WHEREAS, on January 12, 2018, Hadsell filed his Complaint, naming Wapnick and others as
5 defendants (*see* Dkt. No. 1);

6 WHEREAS, Wapnick’s counsel—Murphy, Pearson, Bradley & Feeney—was retained on or
7 about March 9, 2018 to defend Wapnick in this matter;

8 WHEREAS, Wapnick’s counsel, having only recently been retained, requires an opportunity to
9 review the underlying case file and determine the appropriate responsive pleading in this matter;

10 WHEREAS, Wapnick has requested, and Hadsell has consented to the request, that Wapnick file
11 her answer or response to Hadsell’s Complaint on or before April 20, 2018;

12 WHEREAS, no prior extensions of time have been requested or granted; and

13 WHEREAS, the requested extension of time to respond to the Complaint would require a
14 modification of the case schedule by delaying the last day: (1) to meet and confer over ADR process
15 selection and initial disclosures; (2) to serve the initial disclosures; and (3) to file the Rule 26(f) Report
16 and Case Management Conference Statement as Wapnick’s answer or response would be due after the
17 initial Case Management Conference is set to occur;

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1 NOW, THEREFORE, IT IS HEREBY STIPUALTED by and between the parties, through their
2 respective counsel, that Wapnick shall answer or otherwise respond to Hadsell's Complaint on or before
3 April 20, 2018.

4 **SO STIPULATED.**

5 Dated: 3/20/2018

MURPHY, PEARSON, BRADLEY & FEENEY

7 /s/ Whitney M. Carlson
8 By _____
9 Whitney M. Carlson
Attorneys for Defendant
TRACEY WAPNICK

11 Dated: 3/19/18

12 By *Christopher Hadsell*
13 Christopher Hadsell
14 Plaintiff in Propria Persona

16 **[PROPOSED] ORDER**

17 PURSUANT TO STIPULATION, IT IS SO ORDERED. Wapnick is to answer or otherwise
18 respond to Hadsell's Complaint on or before April 20, 2018.

20 Dated: 3/21/18

21 *Kandis Westmore*
22 Hon. Kandis A. Westmore
23 United States Magistrate Judge