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5 Attorney for Plaintiff,  
 Albert Dytch

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

11 ALBERT DYTCH,	)	No. 4:20-cv-06030-SBA
	)	
12 Plaintiff,	)	<b>STIPULATION FOR EXTENSION OF</b>
	)	<b>TIME FOR PLAINTIFF TO FILE</b>
13 vs.	)	<b>MOTION FOR ATTORNEY’S FEES AND</b>
	)	<b>COSTS; ORDER</b>
14 MOUSSAKA MEDITERRANEAN	)	
15 KITCHEN LLC, et al.,	)	
	)	
16 Defendants.	)	

17

18 **WHEREAS**, on June 15, 2022, Plaintiff, Albert Dytch (“Plaintiff”), and Defendants  
 19 Moussaka Mediterranean Kitchen, LLC and Croce and Marisa Bevilacqua, on behalf of the  
 20 2003 Bevilacqua Family Trust under instrument dated Dec. 8, 2003 (collectively “Defendants,”  
 21 and together with Plaintiff, “the Parties”), stipulated to dismiss this action with prejudice and  
 22 consented for the Court to retain jurisdiction over the action for the purpose of adjudicating  
 23 Plaintiff’s motion to recover attorney’s fees and costs (“Fees Motion”) (Dkt. 57);

24 **WHEREAS**, on June 16, 2022, the Court entered its Order approving the Parties’  
 25 stipulation and ordered Plaintiff to file his Fees Motion within 45 days (Dkt. 58), which puts  
 26 the deadline at August 1, 2022;

27 **WHEREAS**, the Parties have been engaged in good faith meet and confer efforts  
 28 pursuant to Local Rule 54-5, in which Plaintiff has provided a detailed breakdown of the fees

1 and costs he is seeking to Defendants, and Defendants have agreed to review the breakdown  
2 and identify any time or cost entries that are disputed, so that the Parties can further meet and  
3 confer in an effort to resolve as many of these issues as possible prior to Plaintiff filing his  
4 Fees Motion;

5 **WHEREAS**, counsel had scheduled a further meet and confer telephone conference for  
6 today, July 21, 2022, to discuss the aforementioned, but counsel for Moussaka Mediterranean  
7 Kitchen, LLC has become unavailable due to a family medical emergency and has requested to  
8 postpone settlement discussions while he attends to said family issues;

9 **WHEREAS**, the Parties wish to extend the deadline for Plaintiff to file his Fees  
10 Motion in order to provide more time to exhaust settlement efforts before Plaintiff must  
11 prepare the motion;

12 **NOW, THEREFORE**, the Parties, through their counsel of record, hereby stipulate to  
13 extend the deadline for Plaintiff to file his Fees Motion until August 15, 2022.

14 **IT IS SO STIPULATED.**

15 Dated: July 21, 2022

MOORE LAW FIRM, P.C.

16 /s/ Tanya E. Moore

17 Tanya E. Moore  
18 Attorney for Plaintiff,  
19 Albert Dytch

20 Dated: July 21, 2022

YUDIEN LAW FIRM, P.C.

21 /s/ Jordan Yudien

22 Jordan Yudien  
23 Attorney for Defendant,  
Moussaka Mediterranean Kitchen LLC

24 Dated: July 21, 2022

BURNHAM BROWN

25 /s/ Charles A. Alfonzo

26 Charles A. Alfonzo  
27 Attorneys for Defendants,  
28 Croce Bevilacqua, Trustee of the 2003 Bevilacqua  
Family Trust under instrument dated Dec. 8, 2003;

1 and Marisa Bevilacqua, Trustee of the 2003  
2 Bevilacqua Family Trust under instrument dated  
3 Dec. 8, 2003

4 **ATTESTATION**

5 Concurrence in the filing of this document has been obtained from each of the individual(s)  
6 whose electronic signature is attributed above.

7 /s/ Tanya E. Moore

8 Tanya E. Moore  
9 Attorney for Plaintiff,  
Albert Dytch

10 **ORDER**

11 The parties having so stipulated and good cause appearing,

12 **IT IS HEREBY ORDERED** that the deadline for Plaintiff Albert Dytch to file his  
13 motion for attorney's fees and costs, as set forth in the Court's Order dismissing this action  
14 (Dkt. 58), is extended to August 15, 2022.

15 **IT IS SO ORDERED.**

16  
17 Dated: 8/2/2022

18 *Sandra B. Armstrong* RS  
19 Richard Seeborg for Sandra Brown Armstrong  
20 United States District Judge  
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