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13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA

16 DANIEL DELGADO,
 17 Plaintiff,
 18 v.
 19 DHARM-JIT HOLDING COMPANY, LLC;
 20 STANDARD FOOD SERVICE, LLC dba
 DENNY'S,
 21 Defendants.

Case No. CV 11-2037

**SECOND JOINT STIPULATION OF
 TIME EXTENDING TIME FOR
 DATES STATED IN SCHEDULING
 ORDER FILED APRIL 25, 2011;
 [PROPOSED] ORDER**

Complaint Filed: 4/25/2011

Trial Date: None set

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1 Plaintiff DANIEL DELGADO and Defendants DHARM-JIT HOLDING COMPANY,
2 LLC and STANDARD FOOD SERVICE, LLC dba DENNY'S (collectively "Defendants")
3 hereby jointly stipulate, through their attorneys of record, to an extension of time of the deadline
4 by which the Parties must hold a joint site inspection of the premises, and all ensuing or
5 dependent dates, as set forth in the "Scheduling Order for Cases Asserting Denial of Right of
6 Access Under Americans With Disabilities Act Title II & III (42 U.S.C. 12131-89)" ("Scheduling
7 Order"), filed April 25, 2011. With this stipulated extension, the deadline for the site inspection
8 shall be extended from September 19 to October 31, 2011; the deadline for completion of initial
9 disclosures shall be extended from September 12 to October 23, 2011; the last date by which the
10 Parties shall meet and confer to discuss settlement shall be extended from October 3 to October
11 31, 2011; etc.

12 The Parties' stipulation is based on the following:

- 13 (1) All Parties though their counsel have jointly agreed to extend the date for the joint site
14 inspection, the date for initial disclosures, the date for meet and confer discussions,
15 and all other dependent or ensuing dates set forth in the Scheduling Order, based on
16 the mutual unavailability and other scheduling commitments of counsel for the Parties
17 and their experts; and
- 18 (2) The Parties have scheduled a joint site inspection on October 12, 2011, at 10:00 a.m.;
19 and
- 20 (3) In light of the foregoing and the Parties' stipulation above, the Parties agree good
21 cause exists to extend these dates in the Scheduling Order, subject to the mutual
22 availability of counsel and their experts.

23 IT IS SO STIPULATED.

24 Dated: September 13, 2011

MOORE LAW FIRM, P.C.

25
26 /s/ Tanya E. Moore
Tanya E. Moore
27 Attorneys for Plaintiff
DANIEL DELGADO
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1 Dated: September 13, 2011

JACKSON LEWIS LLP

2
3 /s/ Cara Ching-Senaha

Jamerson C. Allen

Cara Ching-Senaha

4 Attorneys for Defendants

5 DHARM-JIT HOLDING COMPANY, LLC and

STANDARD FOOD SERVICE, LLC dba DENNY'S

6
7 **ORDER**

8 Having considered the Parties' Stipulation and the grounds stated therein, and for good
9 cause shown, the Court hereby extends the dates set forth in the Scheduling Order, as follows:

10 The deadline for the site inspection shall now be October 31, 2011;

11 The deadline for completion of initial disclosures shall now be October 23, 2011; and

12 The last date by which the Parties shall meet and confer to discuss settlement shall be
13 October 31, 2011.

14 IT IS SO ORDERED.

15
16 Date:

Paul S. Allen