

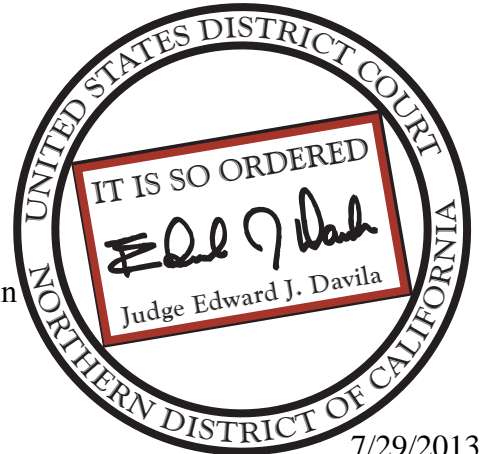
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13 Attorneys for Defendant  
 14 CON-LEE RESTAURANTS, INC. (Erroneously sued herein  
 as CON-LEE RESTAURANTS, INC., aka CON MAC  
 15 RESTAURANTS, INC. dba MCDONALD'S  
 RESTAURANTS aka MCDONALD'S #620)



7/29/2013

17 **UNITED STATES DISTRICT COURT**  
 18 **NORTHERN DISTRICT OF CALIFORNIA**

19 CECIL SHAW,  
 20 Plaintiff,

21 v.

22 CON-LEE RESTAURANTS, INC., aka CON  
 MAC RESTAURANTS, INC. dba  
 23 MCDONALD'S RESTAURANTS aka  
 MCDONALD'S #620; HENRY S. NIGRO,  
 24 Trustee of the NIGRO FAMILY TRUST  
 DATED February 28, 2013; LUCINDA R.  
 25 HENDERSON-NIGRO, Trustee of the  
 NIGRO FAMILY TRUST DATED February  
 26 28, 2013; ANDREA M. TOM, Co-Trustee of  
 the Andrea M. Tom Living Trust dated June  
 27 14, 2004; T. RAYMOND TOM, Co-Trustee  
 of The Andrea M. Tom Living Trust dated  
 28 June 14, 2004; ROSE TOM, Co-Trustee of  
 The Andrea M. Tom Living Trust dated June

No. 13-cv-02633 EJD

**STIPULATION TO EXTEND TIME TO  
 RESPOND TO INITIAL COMPLAINT  
 (Local Rule 6-1)**

**Complaint Served: July 11, 2013**  
**Current Response Date: August 1, 2013**  
**New Response Date: August 15, 2013**  
**Complaint Filed: June 7, 2013**

1 14, 2004; ALAN L. T. JOE, Trustee of the  
ALAN L. T. JOE and VIRGINIA KIT-YEE

2 JOE REVOCABLE TRUST, dated October  
3 4, 1994; VIRGINIA KIT-YEE JOE, Trustee  
4 of the ALAN L. T. JOE and VIRGINIA KIT-  
5 YEE JOE REVOCABLE TRUST; FRANCIS  
6 LEE and ANITA LEE, Husband and Wife as  
7 Community Property; FORREST J.  
8 CIOPPPA LIVING TRUST U/A dated March  
9 31, 1987; YUNG FENG, Trustee of the  
10 FENG FAMILY TRUST dated August 3,  
11 1984; RONY Y. FENG, Trustee of the  
12 FENG FAMILY TRUST dated August 3,  
13 1984; TIMMY KIN CHUNG YUNG, Co-  
14 Trustee of the "YUNG FAMILY 1992  
15 TRUST" dated August 4, 1992; ALICE AR-  
16 LAI YUNG in Trust, Co-Trustee of the  
17 "YUNG FAMILY 1992 TRUST" dated  
18 August 4, 1992,

11 Defendants.

14 Plaintiff CECIL SHAW ("Plaintiff") and Defendant CON-LEE RESTAURANTS, INC.  
15 (Erroneously sued herein as CON-LEE RESTAURANTS, INC., aka CON MAC  
16 RESTAURANTS, INC. dba MCDONALD'S RESTAURANTS aka MCDONALD'S #620)  
17 ("Defendant"), through their counsel of record, HEREBY STIPULATE and agree that  
18 Defendant's time to answer or otherwise plead and respond to Plaintiff's complaint shall be  
19 extended to August 15, 2013.

20 Defendant's answer or responsive pleading is presently due on August 1, 2013, and the  
21 parties have agreed upon an extension to August 15, 2013. No hearings, conferences, or other  
22 deadlines have yet been set by the Court.

23 Good cause exists to extend Defendant's time to answer or otherwise respond to  
24 Plaintiff's complaint. The parties are in agreement that this extension is appropriate in order to  
25 afford Defendant the opportunity to investigate the allegations of the complaint and potentially  
26 permit the parties to commence early settlement negotiations. This stipulation represents the  
27 parties' first agreement to extend Defendant's response deadline.

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Plaintiff's counsel has authorized the filing of this stipulation with her electronic signature.

DATED: July 26, 2013

MOORE LAW FIRM, P.C.

/s/ Tanya E. Moore  
TANYA E. MOORE  
Attorneys for Plaintiff  
CECIL SHAW

DATED: July 26, 2013

BURNHAM BROWN

/s/ Brendan M. Brownfield  
BRENDAN M. BROWNFIELD  
Attorneys for Defendant CON-LEE  
RESTAURANTS, INC. (Erroneously sued herein  
as CON-LEE RESTAURANTS, INC., aka CON  
MAC RESTAURANTS, INC. dba MCDONALD'S  
RESTAURANTS aka MCDONALD'S #620)

4823-3290-2165, v. 1