



1 expenditure of fees and time, the parties agree that Defendant, with the Court's approval, may  
2 forego filing an answer to the remaining claims in the current complaint (ECF No. 1), which  
3 answer would be due on June 4, 2021 per Fed. R. Civ. Pro. 12(a)(4)(A).

4 5. Instead, Defendant will file only a response to the impending amended complaint  
5 within the timelines set forth in the Rules.

6 6. This is the first request to modify these deadlines.

7 7. This stipulation is not made for the purposes of delay but is intended to be made  
8 with good cause to avoid unnecessary and duplicative work causing extra fees to be incurred by  
9 the parties.

10 Dated this 2<sup>nd</sup> day of June 2021.

Dated this 2<sup>nd</sup> day of June, 2021.

11 FOX ROTHSCHILD LLP

GARG GOLDEN LAW FIRM

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17 IT IS SO ORDERED.  
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UNITED STATES MAGISTRATE JUDGE

22 DATED: June 3, 2021  
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