Keck v. LITB, Inc. et al

Doc. 6

Case 2:17-cv-01671-JLR Document 5 Filed 01/23/18 Page 1 of 4

2

3

5

Mathew K. Higbee, Esq., SBN 42755
HIGBEE & ASSOCIATES

1504 Brookhollow Dr., Suite 112

Santa Ana, CA 92705

(714) 617-8352

(714) 597-6729 facsimile

Email: mhigbee@higbeeassociates.com

Attorney for Plaintiff,
MICHEL KECK

9

10

12

13

14

15

16

17

18

19

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON

11 MICHEL KECK, an individual,

Plaintiff,

V.

LITB INC. d/b/a www.lightinthebox.com, a Washington corporation; and, DOES 1 through 50 inclusive,

Defendants.

Case No. 2:17-cv-01671-JLR

MOTION AND PROPOSED ORDER TO EXTEND TIME TO FILE ANSWER OR OTHER RESPONSIVE MOTION

QUR.

20

2122

23

24

25

26

27

28

MOTION AND [PROPOSED] ORDER TO EXTEND TIME

CASE No. 2:17-cv-01671-JLR

22

23

24

25

26

27

28

	WHEREAS, Plaintiff Michel Keck ("Plaintiff") filed her complaint on
Nover	mber 7, 2017 naming as defendants LITB INC. d/b/a www.lightinthebox.com
and D	OES 1 through 50 (collectively "Defendants") (Dkt. #1);

WHEREAS, pursuant to Defendants' timely waiver of service, the time for Defendants to answer or otherwise move in response to the complaint is January 26, 2018;

WHEREAS, counsel for Plaintiff has been in communication with counsel for Defendants to discuss settlement and the parties have agreed to extend the time for Defendants to answer or otherwise respond to the complaint for two additional weeks in light of these discussions;

NOW, THEREFORE, pursuant to the parties' agreement, Plaintiff respectfully moves the Court to extend the time for the Defendants to answer or otherwise move in response to the complaint to February 9, 2018.

DATED: January 23, 2017

HIGBEE & ASSOCIATES

By: /s/ Mathew K. Highee

Mathew K. Higbee, Esq., Washington Bar No. 42755 1504 Brookhollow Dr., Suite 112 Santa Ana, CA 92705 (714) 617-8352 (714) 597-6729 facsimile Email: mhigbee@higbeeassociates.com Counsel for Plaintiff

Case 2:17-cv-01671-JLR Document 5 Filed 01/23/18 Page 3 of 4

PROPOSED ORDER

IT IS SO ORDERED that the deadline for the Defendants to answer or otherwise move in response to Plaintiff's complaint shall be February 9, 2018.

DATED: 1 February, 2018

JAMES L. ROBÂRT DI\$TRICT JUDGE Aur

PROOF OF SERVICE

I am employed in the County of Orange, State of California; I am over the age of 18 and not a party to the within action; my business address is 1504 Brookhollow Dr., Ste 112, Santa Ana, California, 92705

On January 23, 2018, I served the foregoing document(s) described as:

MOTION AND [PROPOSED] ORDER TO EXTEND TIME TO FILE ANSWER OR OTHER RESPONSIVE MOTION

X (BY EMAIL) I caused such documents to be delivered via electronic mail to the email addresses for counsel as follows:

Harrison "Buzz" Frahn hfrahn@stblaw.com Michael H. Joshi Michael H. Joshi Michael.Joshi Michael.Joshi Michael.Joshi Michael.Joshi Michael.Joshi Michael.Joshi Michael.Joshi <a href

(BY MAIL) I deposited such envelope in the mail at Santa Ana, California. The envelope was mailed with postage thereon fully prepaid and addressed to the person below:

(BY PERSONAL SERVICE) by causing a true and correct copy of the above documents to be hand delivered in sealed envelope(s) with all fees fully paid, to the person(s) at the address(es) set forth below:

(BY EXPRESS MAIL) I deposited such envelope on the parties in said action via FEDEX STANDARD OVERNIGHT by placing a copy in a sealed envelope, postage pre-paid and depositing in a FedEx box at Santa Ana, California to the person(s) below:

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on January 23, 2018, at Santa Ana, California.

/s/ Ryan E. Carreon Ryan E. Carreon

TO EXTEND TIME

MOTION AND [PROPOSED] ORDER

-3-

2:17-cv-01671-JLR