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 King's Casino, LLC*

**UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF CALIFORNIA**

VERONICA BRILL, et al.,)	Case No. 19-cv-2027-MCE-AC
)	
Plaintiffs,)	The Honorable Morrison C. England, Jr.
)	
v.)	SECOND STIPULATION TO EXTEND
)	KING'S CASINO'S TIME TO RESPOND
MICHAEL L. POSTLE, et al.)	TO COMPLAINT; ORDER THEREON
)	
Defendants.)	Complaint Filed: October 8, 2019
)	
)	

Plaintiffs Veronica Brill et al. ("Plaintiffs"), by and through counsel; Defendant King's Casino, LLC d/b/a The Saloon at Stones Gambling Hall ("King's Casino"), by and through counsel; and Defendant Justin Kuraitis ("Kuraitis" and collectively with King's Casino, "Defendants"), hereby stipulate and agree as follows:

First, that on October 15, 2019, Plaintiffs served King's Casino with the Complaint and Summons. The parties stipulated to extend King's Casino's time to respond to the Complaint by 28 days under Local Rule 144(a), and its date to respond to the Complaint is presently December 3, 2019. [See Doc. 7.]

1 Second, that on November 9, 2019, Plaintiffs requested that Kuraitis waive service
2 of the Complaint under Federal Rule of Civil Procedure 4(d). Kuraitis agreed to do so, and
3 the parties stipulated to extend his time to respond to the Complaint by 28 days under
4 Local Rule 144(a). Accordingly, Kuraitis's date to respond to the Complaint is February 5,
5 2020.

6 Third, that Plaintiffs have not yet served defendant Michael L. Postle.

7 Fourth, that a court may extend the time for a party to respond to a complaint for
8 good cause. Fed. R. Civ. Pro. 6(b).

9 Fifth, that good cause exists because Defendants King's Casino and Kuraitis have
10 informed Plaintiffs that they intend to file Rule 12 Motions challenging, *inter alia*, the Court's
11 lack of subject-matter jurisdiction over the state law claims against them and the
12 Complaint's failure to state any claim upon which relief can be granted. Because King's
13 Casino and Kuraitis are named in the same counts and are facing largely overlapping
14 factual allegations, the parties anticipate that their Rule 12 Motions will raise many of the
15 same legal issues and rely on many of the same legal authorities. The parties agree that it
16 would be more efficient for the parties and the Court to have Defendants' Rule 12 Motions
17 filed and heard at the same time.

18 By entering into this Stipulation, Defendants do not enter a general appearance and
19 do not waive (and expressly reserve) all rights, legal challenges, and arguments, including
20 any jurisdictional or other defenses that may be raised in a motion under Federal Rule of
21 Civil Procedure 12(b).

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23 //

24 //

SO STIPULATED.

Dated: November 18, 2019

DUANE MORRIS LLP

By: s/Michael L. Lipman
Michael L. Lipman
Duane Morris LLP
Attorneys for Defendant
King's Casino, LLC

Dated: November 17, 2019

THE VERSTANDIG LAW FIRM, LLC

By: /s/ Maurice VerStandig (as authorized on
11/17/2019
Maurice B. VerStandig (pro hac vice)
The VerStandig Law Firm, LLC
Attorneys for Plaintiffs

Dated: November 15, 2019

Justin Kuraitis (in propria persona) /s/

ORDER

The court, having considered the Second Stipulation for Extension of Time to Respond to Complaint, and finding good cause therefore, hereby orders:

King's Casino's time to respond to Plaintiffs' Complaint shall be extended from December 3, 2019, to February 5, 2020.

IT IS SO ORDERED.

Dated: November 25, 2019

MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE