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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SACRAMENTO DIVISION

MARY JO SAAVEDRA,

Plaintiff,

v.

RIDDELL MACKEY, JEFFREY DEGROOT, and EAN HOLDINGS LLC, an Oklahoma limited liability company, and DOES 1 TO 25, inclusive,

Defendants.

CASE NO. 2:21-CV-01587-KJM-JDP

Chief District Judge Kimberly J. Mueller, Courtroom 3

JOINT STIPULATION AND PROPOSED ORDER TO EXTEND TIME TO FILE RESPONSIVE PLEADING

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

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Pursuant to Fed. R. Civ. P. 6 and Local Rule 144 of the Eastern District of California, Plaintiff Mary Saavedra ("Plaintiff") and Defendant EAN Holdings, LLC ("Defendant") hereby stipulate to the following:

Whereas, Defendant has provided Plaintiff with evidence and legal authority that it believes establishes the Complaint, at least as currently pled, does not allege a viable claim against it. Accordingly, the Parties have been in the process of meeting and conferring regarding Defendant's prospective motion to dismiss;

Whereas, in order to continue these discussions, Plaintiff granted Defendant a two-week extension for Defendant to respond to the Complaint, so that the new response date was December 8, 2021;

Whereas, on December 4, 2021, Plaintiff's counsel stated he needed additional time to consider the authorities provided by Defendant in order to continue the meet and confer process;

Whereas, on December 17, 2021 the Parties' counsel discussed the potential motion to dismiss and other aspects of the case and agreed to extend Defendant's responsive pleading deadline to January 4, 2022;

WHEREFORE, the Parties stipulate to an extension of time up to and including January 4, 2022, for Defendant to file an answer, motion to dismiss or otherwise respond to the Complaint.

Dated: December 21, 2021

POLSINELLI LLP

By: */s/ Wesley D. Hurst*

Attorneys for Defendant
EAN Holdings, LLC

Dated: December 21, 2021

OSWALD & MITCHELL

/s/ Jack Thomas Oswald (as authorized on December 21, 2021, per Local Rule 131(e).)

By: _____

Attorneys for Plaintiff
Mary Saavedra

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ORDER

Based on the foregoing Stipulation of the Parties and good cause appearing, the Court hereby extends the deadline up to and including January 4, 2022, for Defendant to file an answer, motion to dismiss or other response to the Complaint.

IT IS SO ORDERED.

DATED: January 4, 2022.

CHIEF UNITED STATES DISTRICT JUDGE