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Attorneys for Defendant
The Lifetime Value Co. LLC

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

BRIAN HEINZ, ERIC SWEETEN, MARIE
EDWARDS, LULA LEWIS, SHARON
MUANGPRASERT, and TYREE
CALDWELL, individually and on behalf of
similarly-situated persons,

Plaintiffs,

v.

THE LIFETIME VALUE CO. LLC,
Defendant.

Case No.: 2:25-cv-00949-JAM-SCR

Hon. Senior District Judge John A. Mendez

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT TO
RESPOND TO COMPLAINT (LOCAL
RULE 144(a))**

Action Filed:	March 26, 2025
Current Response Date:	July 31, 2025
New Response Date:	September 15, 2025

Pursuant to Eastern District Local Rule (“LR”) 144(a), Plaintiffs Brian Heinz, Eric Sweeten, Marie Edwards, Lula Lewis, Sharon Muangprasert, and Tyree Caldwell (collectively, “Plaintiffs”) and Defendant The Lifetime Value Co. LLC (“Defendant”) (together, the “Parties”) hereby enter into this Joint Stipulation and request for an Order by the Court (the “Stipulation”) as follows:

WHEREAS, Plaintiffs filed the Complaint in this action on March 26, 2025 (ECF No. 1);

WHEREAS, Defendant executed a waiver of the service of summons on April 21, 2025 (ECF No. 6);

WHEREAS, Defendant’s original deadline to file and serve an answer or motion under Fed. R. Civ. Proc. Rule 12 (“Rule 12”) was June 16, 2025;

WHEREAS, on May 30, 2025, the Parties entered into a stipulation extending the time for Defendant to respond to the Complaint for 45 days to allow the Parties to engage in settlement discussions (ECF No. 9);

WHEREAS, on June 4, 2025, the Court approved the May 30 stipulation and extended the time for Defendant to respond to the Complaint by 45 days (ECF No. 11);

WHEREAS, the current deadline for Defendant to file and serve an answer or motion under Rule 12 is July 31, 2025;

WHEREAS, the Parties are still engaged in discussions to potentially resolve this dispute and believe that additional time to file and serve an answer or motion under Rule 12 may facilitate a resolution without further litigation;

WHEREAS, the Parties stipulate and agree that a 46-day extension until September 15, 2025 for Defendant to answer, move, or otherwise respond to the Complaint will allow the Parties sufficient time to engage in good faith discussions to resolve this dispute;

WHEREAS, in entering into this stipulation, Defendant expressly reserves all its claims, rights, and defenses in this matter, including but not limited to the Defendant’s right to contest the subject matter and personal jurisdiction of this Court and the sufficiency of Plaintiffs’ claims for relief, under Rule 12 and otherwise; and

WHEREAS, consistent with these recitals, the Parties agree that Defendant does not make a general appearance by signing this Stipulation;

1 **NOW, THEREFORE, BY AND THROUGH THEIR COUNSEL OF RECORD AND**
2 **SUBJECT TO THE APPROVAL OF THIS COURT, THE PARTIES HEREBY**
3 **STIPULATE AND AGREE THAT:**

4 Defendant's response to the initial complaint (including any motion, answer, challenge to
5 this Court's jurisdiction, or other response) is now due on or before September 15, 2025.

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7 Dated: July 18, 2025

HOGAN LOVELLS US LLP

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9 By: /s/ Amber Trincado

Vassi Iliadis
Amber M. Trincado
Jon M. Talotta

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12 *Attorneys for Defendant*
THE LIFETIME VALUE CO. LLC

13 Dated: July 18, 2025

14 By: /s/ Brian J. Wanca

Brian J. Wanca
S. Chandler Visser
Wallace C. Solberg

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17 *Attorneys for Plaintiffs*
BRIAN HEINZ, ERIC SWEETEN, MARIE
18 EDWARDS, LULA LEWIS, SHARON
19 MUANGPRASERT, and TYREE
20 CALDWELL

ORDER

The Court has read and considered the parties' Stipulation to Extend Defendant's Time to Respond to Complaint. Based on the Stipulation, **IT IS ORDERED** that the deadline for Defendant The Lifetime Value Co. LLC to move, answer, or otherwise respond to Plaintiffs' complaint is **EXTENDED** until (and including) **September 15, 2025**.

IT IS SO ORDERED.

Dated: July 21, 2025

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE