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Counsel for Plaintiffs

**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 BRIEFING SCHEDULE ON
DEFENDANT'S MOTION TO DISMISS
AND CONTINUE THE HEARING**

Action Filed:	March 26, 2025
Current Response Date:	October 28, 2025
New Response Date:	November 14, 2025
New Reply Date:	December 12, 2025
New Motion Date:	January 27, 2026 1:00 p.m.

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 filed (after extension of time granted by this Court) its Motion to Dismiss on September 15, 2025 (ECF No. 16);

WHEREAS, Plaintiffs’ filed a First Amended Complaint on September 29, 2025 and vacated the November 18, 2025 hearing date (ECF No. 20);

WHEREAS, the Court denied Defendant’s motion as moot and vacated the November 18, 2025 hearing date (ECF No. 21);

WHEREAS, Defendant filed its Motion to Dismiss First Amended Complaint on October 14, 2025, setting it for hearing on December 9, 2025 (ECF No. 26);

WHEREAS, Pursuant to L.R. 230(c), Plaintiffs’ Opposition is due fourteen (14) days thereafter, making Plaintiffs’ response due October 28, 2025.

WHEREAS, the Parties stipulate and agree to extend Plaintiff’s Opposition due date, as well as reply date for Defendant, and to reset the hearing date; and

WHEREAS, the Parties agree to the following briefing schedule: Plaintiff to file their opposition to Defendant’s Motion to Dismiss by November 14, 2025, Defendant to file its Reply by December 12, 2025, and the hearing date be reset for January 27, 2025 at 1:00 p.m.

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

Plaintiffs’ Opposition to Defendant’s Motion to Dismiss First Amended Complaint is now due on or before November 14, 2025; Defendant’s Reply is now due on or before December 12, 2025; and the Hearing date on Defendant’s Motion to Dismiss of December 9, 2025 be vacated and reset to January 13, 2025 at 1:00 p.m.

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2 Dated: October 29, 2025

ANDERSON + WANCA

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4 By: /s/ Brian J. Wanca

Brian J. Wanca (*admitted Pro Hac Vice*)
S. Chandler Visher - S.B.N 52957

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6 *Attorneys for Plaintiffs*

7 BRIAN HEINZ, ERIC SWEETEN, MARIE
8 EDWARDS, LULA LEWIS, SHARON
9 MUANGPRASERT, and TYREE
10 CALDWELL

11 Dated: October 29, 2025

12 By: /s/ Amber M. Trincado

13 (As authorized on October 24, 2025)
14 Vassi Iliadis
15 John M. Talotta
16 Amber M. Trincado

17 *Attorneys for Defendant*

18 THE LIFETIME VALUE CO. LLC
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ORDER

Based on the stipulation of the parties, the deadline for Plaintiffs to file their Opposition to Defendant's Motion to Dismiss the First Amended Complaint (ECF No. 26), is **EXTENDED** to **November 14, 2025**; Defendant's Reply deadline is **EXTENDED** to **December 12, 2025**; and the currently scheduled Hearing Date of December 09, 2025 is **VACATED** and **RESET** to **January 27, 2026, at 1:00 p.m., in person**, in Courtroom 6, on the 14th floor of the Robert T. Matsui U.S. Courthouse, before Senior District Judge John A. Mendez

IT IS SO ORDERED.

Dated: October 29, 2025


JOHN A. MENDEZ,
SENIOR UNITED STATES DISTRICT JUDGE