

1 Tanya E. Moore, State Bar No. 206683
2 MOORE LAW FIRM, P.C.
3 332 North Second Street
4 San Jose, California 95112
5 Telephone (408) 298-2000
6 Facsimile (408) 298-6046
7 Email: tanya@moorelawfirm.com

8 Attorneys for Plaintiff Ronald Moore

9 Ryan M. McNamara, State Bar No. 223606
10 CALL & JENSEN
11 A Professional Corporation
12 610 Newport Center Drive, Suite 700
13 Newport Beach, CA 92660
14 Tel: (949) 717-3000
15 Fax: (949) 717-3100
16 Rmcnamara@calljensen.com

17 Attorneys for Defendants Fresno Shaw Blackstone, LLC,
18 Bertao Family Industries, Inc. dba Papa Murphy's, Al Bawadi, Inc.
19 dba Elbasha Mediterranean Grill & Hookah, Dimas Manuel Inc.
20 dba Ramos Furniture Home Store, Four Brothers, Inc., dba Ramos
21 Furniture Home Store and Ali Abdullah dba US Furniture

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

24 RONALD MOORE,

25 Plaintiff,

26 vs.

27 FRESNO SHAW BLACKSTONE, LLC, a
28 California limited liability company;
BERTAO FAMILY INDUSTRIES, INC., a
California corporation, dba PAPA
MURPHY'S; AL BAWADI, INC., a
California corporation, dba ELBASHA

Case No. 13-CV-00528 AWI (GSAx)

**STIPULATION FOR EXTENSION OF
TIME FOR DEFENDANT AL
BAWADI, INC. TO RESPOND TO
COMPLAINT; ORDER THEREON**

1 MEDITERRANEAN GRILL & HOOKAH;
2 DIMAS MANUEL INC., a California
3 corporation, dba RAMOS FURNITURE
4 HOME STORE; FOUR BROTHERS,
5 INC., a California corporation, dba
6 RAMOS FURNITURE HOME STORE;
7 ALI ABDULLAH, dba US FURNITURE,
8
9 Defendants.

Complaint Filed: April 12, 2013
Trial Date: None Set

10 Plaintiff Ronald Moore, by and through his undersigned counsel, and Defendant
11 Al Bawadi, Inc. dba Elbasha Mediterranean Grill & Hookah (collectively “the Parties”),
12 by and through their undersigned counsel, hereby agree as follows:

13 WHEREAS, Defendant Al Bawadi, Inc. dba Elbasha Mediterranean Grill &
14 Hookah (“Al Bawadi, Inc.”) was served on April 24, 2013;

15 WHEREAS, a stipulation to extend the initial response deadline for Defendants
16 Al Bawadi, Inc., Bertao Family Industries, Inc., Dimas Manuel Inc., Four Brothers, Inc.
17 and Fresno Shaw Blackstone, LLC was filed on May 13, 2013 extending the deadline to
18 June 10, 2013;

19 WHEREAS, counsel for the Parties have engaged in successful settlement
20 negotiations since the filing of the initial stipulations to extend time and are in the
21 process of finalizing resolution of this dispute as between them;

22 WHEREAS, counsel for the Parties desire to conserve the resources of the Court
23 as well as their own respective resources by avoiding incurring additional attorneys’
24 fees and costs associated with responsive filings which will likely prove unnecessary
25 due to settlement;

26 WHEREAS, having good cause, the Parties jointly request additional time to
27 allow the Parties to finalize resolution of this dispute as between them;
28

1 NOW THEREFORE, is it hereby stipulated that Defendant Al Bawadi, Inc. shall
2 have to and including July 8, 2013 to respond or otherwise move this Court regarding
3 the Complaint.
4

5 Dated: June 13, 2013

MOORE LAW FIRM, P.C.

6 By: /s/Tanya E. Moore
7 Tanya E. Moore

8 Attorneys for Plaintiff Ronald Moore

9 Dated: June 13, 2013

CALL & JENSEN
A Professional Corporation
Ryan M. McNamara

10 By: /s/Ryan M. McNamara
11 Ryan M. McNamara

12
13 Attorneys for Defendants Fresno Shaw
14 Blackstone, LLC, Bertao Family Industries, Inc.
15 dba Papa Murphy's, Al Bawadi, Inc. dba Elbasha
16 Mediterranean Grill & Hookah, Dimas Manuel
17 Inc. dba Ramos Furniture Home Store, Four
18 Brothers, Inc., dba Ramos Furniture Home Store
19 and Ali Abdullah dba US Furniture

20 **Signature Certification**

21 I hereby certify that the content of this document is acceptable to Tanya E.
22 Moore, counsel for Plaintiff Ronald Moore, and that I have obtained Ms. Moore's
23 authorization to affix her electronic signature to this document.

24 By: /s/Ryan M. McNamara
25 Ryan M. McNamara

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ORDER

Based on the Stipulation of the Parties included above (also at Doc. 18), and for good cause shown, IT IS HEREBY ORDERED as follows:

1. Defendant Al Bawadi, Inc. shall have up to and including July 8, 2013 to answer or otherwise respond to the complaint in this matter.

IT IS SO ORDERED.

Dated: June 13, 2013

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE