

1 Tanya E. Moore, SBN 206683  
MOORE LAW FIRM, P.C.  
2 332 North Second Street  
San Jose, California 95112  
3 Telephone (408) 298-2000  
Facsimile (408) 298-6046  
4 Email: tanya@moorelawfirm.com

5 Attorney for Plaintiff  
Arthur Owens  
6

7  
8 **UNITED STATES DISTRICT COURT**  
9 **EASTERN DISTRICT OF CALIFORNIA**  
10

11 ARTHUR OWENS, )

12 Plaintiff, )

13 vs. )

14 INTERSTATE MANAGEMENT COMPANY )  
15 LLC dba RESIDENCE INN BY MARRIOTT, )  
et al., )

16 Defendants. )  
17 )

No. 1:16-cv-00305-LJO-BAM

**STIPULATION FOR EXTENSION OF  
TIME FOR ALL DEFENDANTS TO  
RESPOND TO COMPLAINT IN EXCESS  
OF 28 DAYS; [~~PROPOSED~~] ORDER**

18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1           **IT IS HEREBY STIPULATED** by and between Plaintiff Arthur Owens, by and  
2 through his counsel of record, and Defendants Interstate Management Company LLC dba  
3 Residence Inn by Marriott and BRE Newton Hotels Property Owner LLC (collectively  
4 “Defendants”), by and through their in-house counsel who is specially appearing on their behalf  
5 for the sole purpose of obtaining this extension, that pursuant to Federal Rule of Civil  
6 Procedure 6(a) and Local Rule 144(a), Defendants may have to and including May 16, 2016 to  
7 file a responsive pleading in this matter. This extension of time is Defendants’ first extension  
8 and does not alter the date of any event or any deadline already fixed by Court order, but does  
9 exceed twenty-eight (28) days.

10  
11 Date: April 26, 2016

MOORE LAW FIRM, P.C.

12  
13 /s/ Tanya E. Moore

14 Tanya E. Moore  
15 Attorney for Plaintiff  
16 Arthur Owens

17 Date: April 26, 2016

18 INTERSTATE MANAGEMENT  
19 COMPANY LLC DBA RESIDENCE INN  
20 BY MARRIOTT and BRE NEWTON  
21 HOTELS PROPERTY OWNER LLC

22 /s/ Robert Rubenstein

23 By: Robert Rubenstein  
24 Specially appearing for Defendants  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

The Parties having so stipulated and good cause appearing,

**IT IS HEREBY ORDERED** that Defendants, Interstate Management Company LLC dba Residence Inn by Marriott and BRE Newton Hotels Property Owner LLC, shall have to and including May 16, 2016 within which to file a responsive pleading.

IT IS SO ORDERED.

Dated: April 27, 2016

*/s/ Barbara A. McAuliffe*  
UNITED STATES MAGISTRATE JUDGE