

ROSE LAW, APC  
11335 GOLD EXPRESS DRIVE, SUITE 135  
GOLD RIVER, CALIFORNIA 95670

1 Joseph W. Rose, State Bar No. 232261  
Mehran Tahoori, State Bar No. 283313  
2 ROSE LAW, APC  
11335 Gold Express Drive, Suite 135  
3 Gold River, California 95670  
Telephone: (916) 273-1260  
4 Facsimile: (916) 290-0148  
Email: [legalteam@joeroselaw.com](mailto:legalteam@joeroselaw.com)

5 Attorneys for Defendants  
6 STRONG AMERICAN CARPET CLEANING  
TECHNOLOGY, LLC, d.b.a. Strong Industries  
7 Corp, BRUSH AND CLEAN, LLC, RICHARD  
BERTOSSA; and MARCUS AGATON WENDT

9 Sean M. Patrick, State Bar No. 287544  
P.O. Box 2822  
10 Rocklin, CA 95677  
Telephone: (916) 612-2574  
11 Facsimile: (916) 721-2727  
Email: [sean@seanpatricklaw.com](mailto:sean@seanpatricklaw.com)

12 Attorney for Plaintiffs  
13 STRONG CARPET CLEANING SYSTEMS, LLC,  
KELLY LOVE, and MICHEAL PRICE

15 UNITED STATES DISTRICT COURT  
16 EASTERN DISTRICT OF CALIFORNIA

17 STRONG CARPET CLEANING SYSTEMS,  
18 LLC, et al.

19 Plaintiffs,

20 v.

21 STRONG AMERICAN DRY CARPET  
22 CLEANING TECHNOLOGY, LLC,  
23 Et al.

24 Defendants.

Case No. 2:16-cv-02857-KJM-KJN

**JOINT STIPULATION TO EXTEND  
DEFENDANTS' TIME TO ANSWER OR  
OTHERWISE RESPOND TO PLAINTIFFS'  
COMPLAINT; ORDER**

CASE FILED: October 18, 2016

**Assigned for all purposes to  
District Judge Kimberly J. Mueller**

26 This stipulation is entered into by and between the undersigned counsel for Defendants  
27 STRONG AMERICAN CARPET CLEANING TECHNOLOGY, LLC, d.b.a. Strong Industries Corp

1 (erroneously sued as “STRONG INDUSTRIES, INC.”), BRUSH AND CLEAN, LLC, RICHARD  
2 BERTOSSA, and MARCUS AGATON WENDT (herein “Defendants”), on the one hand, and counsel  
3 for Plaintiffs STRONG CARPET CLEANING SYSTEMS, LLC, KELLY LOVE, and MICHAEL  
4 PRICE (herein “Plaintiffs”), on the other hand, and is made with reference to the following facts:

5 **RECITALS**

6 1. On October 18, 2016, Plaintiffs initiated this action in Sacramento County Superior  
7 Court.

8 2. On December 4, 2016, Defendants timely removed this action to federal district court  
9 under 28 U.S.C. § 1332(a), 28 U.S.C.A. § 1331, and 28 U.S.C. § 1441(a)-(c), serving notice upon the  
10 Sacramento County Superior Court and upon Plaintiffs of the removal.

11 3. Under Rule 81(c)(2)(C) and section 9 of the court’s Standing Order issued December 5,  
12 2016, Defendants’ deadline to file their answer or present other defenses or objections is currently  
13 seven calendar days following removal, which is December 12, 2016.

14 4. As required by section 4 of the court’s Standing Order issued December 5, 2016,  
15 Plaintiffs and Defendants are engaging in good faith meeting and conferring efforts regarding the  
16 allegation and theories in Plaintiffs’ complaint with the mutual goal of avoiding or limiting in scope, if  
17 possible, motion practice before the court.

18 5. Based upon the availability of counsel through the upcoming holidays and to allow the  
19 good faith meeting and conferring process to continue and be exhausted, counsel for Plaintiffs and  
20 Defendants respectfully request the court extend the deadline for Defendants to file their answer or  
21 present other defenses or objections by an additional twenty-eight calendar days beyond the current  
22 deadline, which would make Defendants’ answer or other responsive pleading due on or before January  
23 9, 2017.

24 **STIPULATION**

25 The undersigned counsel for Plaintiffs and Defendants stipulate and agree the deadline for all  
26 named defendants to answer, object, or otherwise respond to Plaintiffs’ complaint be extended to  
27 January 9, 2017.

///

**IT IS SO STIPULATED.**

Dated: December 6, 2016 ROSE LAW, APC

/s/ Joseph W. Rose

JOSEPH W. ROSE  
Attorney for Defendants  
STRONG AMERICAN CARPET CLEANING  
TECHNOLOGY, LLC, d.b.a. Strong Industries  
Corp, BRUSH AND CLEAN, LLC, RICHARD  
BERTOSSA; and MARCUS AGATON WENDT

Dated: December 6, 2016

/s/ Sean M. Patrick (as authorized on 12/6/2016)

SEAN M. PATRICK  
Attorney for Plaintiffs  
STRONG CARPET CLEANING SYSTEMS, LLC,  
KELLY LOVE, and MICHEAL PRICE

**IT IS SO ORDERED.**

Dated: December 8, 2016.

  
UNITED STATES DISTRICT JUDGE

ROSE LAW, APC  
11335 GOLD EXPRESS DRIVE, SUITE 135  
GOLD RIVER, CALIFORNIA 95670