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12 SUPERIOR COURT OF CALIFORNIA
13 COUNTY OF LOS ANGELES
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15 DR. IMAN SADEGHI, an individual,
16 Plaintiff,
17 v.

18 PINSCREEN, INC., a Delaware Corporation;
19 DR. HAO LI, an individual; and DOES 1 through
100,
20 Defendants.

) Case No. BC709376

) Assigned for all purposes to
Hon. Lia Martin, Dept. 16

) **STIPULATION AND ORDER TO EXTEND
TIME FOR DEFENDANTS PINSCREEN,
INC. AND DR. HAO LI TO RESPOND TO
PLAINTIFF'S VERIFIED COMPLAINT;**

) **[C.R.C. 3.110(e), C.C.P. §§ 430.41 and 435.5]**

) Complaint filed: June 11, 2018
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24 TO THE COURT:

25 Plaintiff Dr. Iman Sadeghi ("Plaintiff") and Defendants Pinscreen, Inc. and Dr. Hao Li
26 ("Defendants"), by and through their undersigned counsel of record, hereby stipulate and agree, subject to
27 Court approval, as follows.

28 WHEREAS, on June 11, 2018 Plaintiff filed his Verified Complaint in the above-captioned matter

1 against Defendants, asserting seventeen (17) causes of action.

2 WHEREAS, on June 27, 2018, Plaintiff filed a Proof of Service of Summons with the Court asserting
3 that Pinscreen was served by personal service on June 18, 2018 and that Dr. Li was served by substituted
4 service on June 19, 2018 followed by a mailing on June 27, 2018;

5 WHEREAS, on July 17, 2018, pursuant to C.R.C. 3.110(d) the Parties agreed to a 15-day extension
6 for Defendants to file a responsive pleading, setting Defendants' response date for August 2, 2018;

7 WHEREAS, after reviewing the 172 page Verified Complaint, Defendants identified a number of
8 areas as to which Defendants believed that a demurrer and motion to strike were appropriate;

9 WHEREAS, however, pursuant to C.C.P. §§ 430.41(a)(2) and 435.5(a)(2), since the Parties were
10 unable to meet and confer at least five days before the date the demurrer or motion to strike must be filed,
11 Defendants obtained an automatic 30-day extension of time within which to file a motion to strike, through
12 September 4, 2018, as set forth in greater detail in the Declaration of Joel L. Benavides filed and served on
13 August 2, 2018;

14 WHEREAS, on August 20, 2018, counsel for Defendants served via email and mail a detailed meet
15 and confer letter to counsel for Plaintiff setting forth Defendants' grounds and legal authority ins support of
16 their intended demurrer and motion to strike;

17 WHEREAS, in subsequent communications, counsel for Plaintiff has confirmed that Plaintiff will be
18 amending his Verified Complaint, but may not do so before Defendants' response deadline;

19 WHEREAS, therefore, in order to provide Plaintiff additional time to file his amended complaint, and
20 so as not to waste judicial resources, pursuant to California Rule of Court 3.110(e), the Parties agree, subject
21 to the Court's approval, to extend Defendants' response deadline by 30 days, through October 4, 2018, and
22 also agree that the time period to respond to the first amended complaint shall be 30 days per C.C.P. §
23 471.5(a);

24 AND WHEREAS, this is the Parties' first request for an extension to file a responsive pleading
25 pursuant to C.R.C. 3.110(e) and the Parties are unaware of any prejudice that would result from such request,
26 nor would the extension cause any modification of any other deadline in this matter;

27 IT IS THEREFORE HEREBY DECLARED, STIPULATED, AND AGREED BY THE PARTIES
28 TO THIS ACTION, AS FOLLOWS:

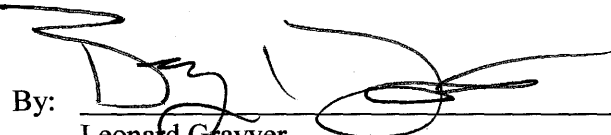
1 1. The time for Defendants Pinscreen, Inc. and Dr. Hao Li to respond to the Verified Complaint
2 shall be extended for 30 days, through October 4, 2018, to permit Plaintiff additional time to file an amended
3 complaint; and

4 2. Plaintiff shall have 30 days after the filing and service of Plaintiff's amended complaint to file
5 a responsive pleading;

6 Dated: 8/31, 2018

GREENBERG, WHITCOMBE, TAKEUCHI,
GIBSON & GRAYVER, LLP


LAW OFFICES OF BENJAMIN DAVIDSON, P.C.

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10
11 By: 
Leonard Grayver
Joel L. Benavides
Benjamin Davidson

Attorneys for PINSSCREEN, INC. and DR. HAO LI

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14 Dated: August 31, 2018

FERNALD LAW GROUP APC

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16
17 By: 
Adam P. Zaffos, Esq.
Attorneys for DR. IMAN SADEGHI

[PROPOSED] ORDER

Pursuant to Stipulation, it is so ORDERED.

Dated: _____

By: _____

HON. LIA MARTIN
Judge of the Superior Court

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