

GREENBERG GLUSKER FIELDS CLAMAN
& MACHTINGER LLP
2049 Century Park East, Suite 2600
Los Angeles, California 90067

1 RICARDO P. CESTERO (SBN 203230)
RCestero@ggfirm.com
2 GREENBERG GLUSKER FIELDS CLAMAN &
MACHTINGER LLP
3 2049 Century Park East, Suite 2600
Los Angeles, California 90067
4 Telephone: 310.553.3610
Fax: 310.553.0687

5 Attorneys for Defendant
6 GOLDEN BOY PROMOTIONS, INC.

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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10 EASTERN DIVISION - RIVERSIDE

11
12 HEREDIA BOXING
MANAGEMENT, INC.; & MOSES
13 HEREDIA,

14 Plaintiffs,

15 v.

16 MTK GLOBAL SPORTS
MANAGEMENT, LLC; GOLDEN
17 BOY PROMOTIONS, INC.; VGC,
LLP; PAUL D. GIBSON; and
18 DANIEL KINAHAN,

19 Defendants.
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Case No. 5:20-cv-02618-JWH-KKx

Assigned to Hon. John W. Holcomb

**JOINT STIPULATION AND
REQUEST FOR EXTENSION OF
TIME FOR DEFENDANT GOLDEN
BOY PROMOTIONS, INC. TO
RESPOND TO COMPLAINT**

Waiver of Summons sent on:
February 1, 2021

Current Response Date: April 2, 2021

New Response Date: April 19, 2021

**STIPULATION AND REQUEST FOR EXTENSION OF TIME FOR
DEFENDANT GOLDEN BOY PROMOTIONS, INC. TO RESPOND TO
COMPLAINT**

The parties stipulate with reference to the following facts:

1. Plaintiffs Heredia Boxing Management, Inc. and Moses Heredia (“Plaintiffs”) filed the operative Amended Complaint on January 18, 2021;

2. In the interest of efficiency and judicial economy Defendant Golden Boy Promotions, Inc. (“Golden Boy”), Golden Boy agreed to execute a Waiver of Service of Summons, with a response deadline of April 2, 2021 pursuant to Federal Rule of Civil Procedure 4(d).

3. On March 26 and 30, 2021, counsel for Golden Boy met and conferred with counsel for Plaintiffs regarding Golden Boy’s intention to file a Motion to Dismiss in response to the Amended Complaint pursuant to Local Rule 7-3.

4. The parties have agreed to further consider their positions with respect to Golden Boy’s contemplated Motion to Dismiss as well as to consider possible settlement of the claims against Golden Boy at this stage.

5. To allow sufficient time for those discussions, the parties agree to an extension of Golden Boy’s time to respond to the Amended Complaint until and including April 19, 2021;

6. This is the first extension of time Golden Boy has requested in this action.

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1 NOW THEREFORE, the parties hereby stipulate and agree that, subject to
2 the Court's approval, Golden Boy shall have an extension through and including
3 April 19, 2021, to respond to the amended complaint in this action.

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5 DATED: April 1, 2021

GREENBERG GLUSKER FIELDS
CLAMAN & MACHTINGER LLP

6
7
8 By:



RICARDO P. CESTERO (SBN 203230)
Attorneys for Defendant GOLDEN BOY
PROMOTIONS, INC.

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11 DATED: April 1, 2021

FEDERAL PRACTICE GROUP

12
13 By: */s/ Rajan O. Dhungana*

14 RAJAN O. DHUNGANA (SBN 297794)
15 ERIC S. MONTALVO (*Pro Hac Vice*)
16 Attorneys for Plaintiffs HEREDIA
BOXING MANAGEMENT, INC. and
17 MOSES HEREDIA

18 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filer attests that all other
19 signatories listed, and on whose behalf the filing is submitted, concur in the filing's
20 content and have authorized the filing.

21
22 DATED: April 1, 2021

GREENBERG GLUSKER FIELDS
CLAMAN & MACHTINGER LLP

23
24
25 By:



26 RICARDO P. CESTERO (SBN 203230)
27 Attorneys for Defendant GOLDEN BOY
28 PROMOTIONS, INC.

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