

BEN ROSENFELD (SBN 203845)
ATTORNEY AT LAW
115 ½ Bartlett Street
San Francisco, CA 94110
Tel: (415) 285-8091
Fax: (415) 285-8092
ben.rosenfeld@comast.net

Attorneys for Plaintiff
Francisco Gudino Cardenas

IN THE SUPERIOR COURT OF CALIFORNIA
FOR THE COUNTY OF ORANGE
(UNLIMITED CIVIL)

FRANCISCO GUDINO CARDENAS, an
individual

Plaintiff,

vs.

GHOST GUNNER INC., d/b/a
GHOSTGUNNER.NET, et al.

Defendants.

No. 30-2019-01111797-CU-PO-CJC

PLAINTIFF'S APPLICATION AND
DECLARATION OF COUNSEL FOR
EXTENSION (SECOND) OF TIME TO
SERVE DEFENDANTS

I, Ben Rosenfeld, declare as follows:

1. I am an attorney licensed to practice law throughout the State of California and before this Court. If called as a witness in this matter, I could and would testify as follows, based on my own knowledge and experience:

2. I followed this action against the above-named defendants on November 14, 2019.

3. I have not yet served this complaint on defendants pending association of additional, expert counsel, including in coordination with counsel for plaintiffs in a related set of

1 cases filed in San Bernadino County Superior Court (Case No. 19-cv-35422), to make sure I am
2 fully equipped to prosecute this case.

3 4. CR 3.110(e) permits the Court, “on its own motion or on the application of a
4 party, may extend or otherwise modify the times provided in” subdivision (b).

5 5. On February 2, 2020 I filed a first request on behalf of plaintiff, and on February
6 10, 2020 the Court granted my request, to extend the deadline for service of this case until May
7 13, 2020.

8 6. Since that time, I have worked assiduously to secure associate counsel. Those
9 efforts were slowed by the global covid19 pandemic. Over the course of the past week, those
10 efforts have borne fruit, so that I in the process of formalizing that association.

11 7. In light of the foregoing, plaintiff respectfully requests a further extension for
12 time for service of the summons and complaint on the named defendants in this case until August
13 28, 2020.

14 8. A proposed order accompanies this request.

15 I swear under penalty of perjury under the laws of the State of California that the
16 foregoing is correct. Sworn and subscribed to in San Francisco, CA on May 12, 2020.

17 Respectfully Submitted,

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21 Dated: May 12, 2020

22 By: Ben Rosenfeld
23 Attorneys for Plaintiff Cardenas
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