

# EXHIBIT B

**From:** Chuck Oldham <chuck.oldham@chdblaw.com>  
**Sent:** Monday, September 8, 2025 5:02 PM  
**To:** Lisa Marx  
**Cc:** Suzanne Hilborn; Ari Bowhay  
**Subject:** RE: Stipulated Extension to Respond to Defendants' Request for Attorney's Fees

Ms. Marx, I will agree to your stipulation. Please note, however, that I do not believe either motion is relevant to the attorneys' fee question.

The motion to vacate is a non-starter. The rules explicitly contemplate that the Court will receive applications for fees after the court renders its ruling on a dispositive motion. While filing an amended complaint may serve to substitute the claims and facts set forth in a previous pleading, it does not impact the court's orders regarding that previous pleading. It's an interesting and novel approach to the issue, but it arises from an inexperience in dealing with court pleadings, motions and the typical approach to a judgment of dismissal or summary judgment. And whether or not you can simply amend a complaint to overcome a ruling of dismissal, which contained no leave to amend, is not material to the attorneys' fees issue. The court allowed us to seek fees incurred in obtaining Mr. Gottmann and Mr. Anderson's dismissal. That fact is not impacted by your inclusion in your amended complaint.

Nevertheless, out of professional courtesy I will agree to the stipulation.

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**From:** Lisa Marx <aimtodogood@gmail.com>

**Sent:** Monday, September 8, 2025 12:25 PM

**To:** Chuck Oldham <chuck.oldham@chdblaw.com>; Lisa Marx <aimtodogood@gmail.com>

**Subject:** Stipulated Extension to Respond to Defendants' Request for Attorney's Fees

Re: Case No. CV2025-012980

Stipulated Extension to Respond to Defendants' Request for Attorney's Fees

Dear Mr. Oldham:

I am writing as the Plaintiff, pro per, in the above-referenced case to request a stipulated extension of time to file my response to the Defendants' Request for Attorney's Fees.

There are currently two pending motions before the Court: (1) my Motion to Vacate Order on Attorney's Fees and (2) the Defendants' Motion to Strike Dennis Anderson and Mark Gottmann. The Court's rulings on these motions are directly relevant to my response to the Request for Attorney's Fees. To avoid unnecessary filings and ensure a fair response, I respectfully request a stipulated extension of ten (10) days from the date of the Court's ruling on each of these motions to file my response.

If the Court issues rulings on the motions on different dates, I propose that the ten-day extension begin from the later of the two rulings to ensure clarity and efficiency. This extension will allow me to prepare a more informed response without unduly delaying the case.

I kindly ask for your agreement to this stipulation. If you agree, please confirm in writing, and I can prepare a

formal stipulation for filing with the Court or request a Court order approving the extension, as needed.

Thank you for considering this request. I look forward to your response.

Sincerely,

Lisa Marx  
Plaintiff, Pro Per