

FENWICK & WEST LLP  
ATTORNEYS AT LAW  
MOUNTAIN VIEW

1 EMMETT C. STANTON (CSB No. 83930)  
estanton@fenwick.com  
2 YIXIN ZHANG (CSB No. 270527)  
yzhang@fenwick.com  
3 GEOFFREY MILLER (CSB No. 308676)  
gmiller@fenwick.com  
4 FENWICK & WEST LLP  
Silicon Valley Center  
5 801 California Street  
Mountain View, CA 94041  
6 Telephone: 650.988.8500  
Facsimile: 650.938.5200  
7

8 EWA M. DAVISON (WSBA No. 39524)  
edavison@fenwick.com  
FENWICK & WEST LLP  
9 1191 Second Avenue, 10th Floor  
Seattle, WA 98101  
10 Telephone: 206.389.4510  
Facsimile: 206.389.4511  
11

Attorneys for TAI HUYNH

12  
13 UNITED STATES DISTRICT COURT  
14 FOR THE EASTERN DISTRICT OF CALIFORNIA  
15

16 TAI HUYNH,  
17  
Plaintiff,  
18  
v.  
19 SUSAN HUBBARD, et al.,  
20  
Defendants.  
21

Case No.: 2:09-cv-1979 MCE CKD P

**STIPULATION AND [PROPOSED]  
ORDER FOR EXTENDING  
DEADLINE TO FILE  
DISPOSITIONAL DOCUMENTS  
PER DKT. NO. 94**

22  
23 Plaintiff Tai Huynh and Defendants, pursuant to Local Rules 143 and 144, hereby  
24 stipulate as follows:

25 The parties appeared before the Court for a settlement conference on November 30, 2017.  
26 At that conference, pursuant to representations by counsel for the parties, the Court determined  
27 that the matter was settled and ordered dispositional documents to be filed not later than 90 days  
28 thereafter, or March 6, 2018. Dkt. No. 94. The parties have exchanged drafts of a settlement

1 agreement and have conferred via telephone, but have not yet been able to finalize all necessary  
2 terms of the agreement.

3 The parties continue to work toward finalizing all necessary terms, and thus hereby  
4 stipulate, subject to the Court's approval, to extend the deadline to file dispositional documents  
5 by 60 days. This is the first extension sought as to this deadline.

6 Good cause exists for the extension as the parties, through their respective counsel, are  
7 working toward a settlement agreement that will resolve this matter and have been working  
8 diligently toward finalizing the settlement agreement.

9 **NOW THEREFORE, IT IS HEREBY STIPULATED**, by and between the parties, and  
10 subject to the Court's approval, that the deadline to file dispositional documents is extended by  
11 60 days.

12 Dated: March 7, 2018

FENWICK & WEST LLP

13

14

By: s/ Geoffrey R. Miller  
Geoffrey R. Miller

15

Attorneys for TAI HUYNH

16

17

Dated: March 7, 2018

XAVIER BECERRA  
Attorney General of California

18

19

By: s/ Joseph R. Wheeler

20

JOSEPH R. WHEELER  
Deputy Attorney General

21

Attorneys for Defendants  
WESTIN, SMITH, NELSON and CALLISON

22

23

**ORDER**

24

Pursuant to the foregoing stipulation, **IT IS SO ORDERED.**

25

Dated: March 7, 2018.

26

  
EDMUND F. BRENNAN

27

UNITED STATES MAGISTRATE JUDGE

28