

FENWICK & WEST LLP  
ATTORNEYS AT LAW

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  
24  
25  
26  
27  
28

1 Plaintiff Tai Huynh and Defendants, pursuant to Local Rules 143 and 144, hereby  
2 stipulate as follows:

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

7 On March 7, 2018, after having exchanged drafts of a settlement agreement and  
8 conferring via telephone, the parties filed a stipulation to extend the time to file dispositional  
9 document by 60 days to May 7, 2018.

10 The parties have reached an agreement in principle in which the parties will submit  
11 dispositional documents to the court after performance of certain terms of the settlement  
12 agreement. In order to permit the parties time to execute the agreement and complete  
13 performance these terms of the agreement, the parties hereby stipulate, subject to the Court's  
14 approval, to extend the deadline to file dispositional documents by 120 days.

15 Good cause exists for the extension as the parties, through their respective counsel, have  
16 worked diligently to complete the settlement agreement and the additional time is requested in  
17 order to permit sufficient time to perform the terms of the agreement.

18 **NOW THEREFORE, IT IS HEREBY STIPULATED**, by and between the parties, and  
19 subject to the Court's approval, that the deadline to file dispositional documents is extended by  
20 120 days.

21  
22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: May 7, 2018

FENWICK & WEST LLP

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

Attorneys for TAI HUYNH

Dated: May 7, 2018

XAVIER BECERRA  
Attorney General of California

By: s/ Joseph R. Wheeler

JOSEPH R. WHEELER  
Deputy Attorney General

Attorneys for Defendants

**ATTESTATION OF SIGNATURES**

I hereby attest that the concurrence in the filing of this document has been obtained from the signatory indicated by a “conformed” signature (/s/) within this e-filed document.

/s/ Geoffrey R. Miller

Geoffrey R. Miller

**ORDER**

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

Dated: May 9, 2018.



Honorable Edmund F. Brennan  
United States Magistrate Judge