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10 Attorney for Plaintiff HOLLYNN D'LIL

11
12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF CALIFORNIA

14 HOLLYNN D'LIL,
15 Plaintiff,

CASE NO. 2:11-CV-02230-WBS-AC
Civil Rights

16 v.

**STIPULATION AND [PROPOSED] ORDER
FOR EXTENSION OF TIME TO FILE
OPPOSITION TO MOTION FOR AWARD
OF ATTORNEYS FEES, LITIGATION
EXPENSES AND COSTS**

17 RIVERBOAT DELTA KING, INC.;
18 CITY OF SACRAMENTO; OLD
SACRAMENTO BUSINESS
19 ASSOCIATION, INC.,

20 Defendants.

21 _____ /
22
23 **TO THE COURT:**

24 On July 20, 2015, Plaintiff Hollynn D'Lil ("Plaintiff")
25 filed a motion seeking an award of attorney's fees, litigation
26 expenses and costs ("Fee Motion"). Defendant Riverboat Delta
27 King's ("Delta King") opposition to Plaintiff's Fee Motion is
28 due on July 13, 2015. Plaintiff's reply to Delta King's

1 opposition is due on July 20, 2015, and this matter is set to be
2 heard by the Court on July 27, 2015.

3 Plaintiff's Fee Motion includes several voluminous
4 attachments. As a result, Delta King's analysis of the
5 voluminous records will require more time than is currently
6 afforded by the existing briefing schedule. Delta King believes
7 it will be prejudiced if it must complete its analysis of the
8 voluminous records within the current schedule.

9 Plaintiff and Delta King met and conferred and the Parties
10 believe that a modest extension of the briefing schedule and
11 related hearing date is reasonable and will afford Delta King
12 sufficient time to complete its review of the voluminous
13 records. Therefore, Plaintiff and Delta King respectfully
14 request that the deadline for Delta King to file its Opposition
15 to Plaintiff's Fee Motion be extended from July 13, 2015, to
16 July 27, 2015. Plaintiff's Reply deadline would be due on
17 August 3, 2015 and hearing on this matter on August 18, 2015.

18 **IT IS SO STIPULATED.**

19 Dated: July 6, 2015 weintraub tobin chediak coleman
grodin law corporation

20 /s/ - Charles L. Post
21 CHARLES L. POST, ESQ.
22 Attorneys for Defendant
RIVERBOAT DELTA KING, INC.

23 Dated: July 6, 2015 THIMESCH LAW OFFICES

24 /s/ Signature Authorized
25 TIMOTHY S. THIMESCH
26 Attorneys for Plaintiff
27 HOLLYNN D'LIL

ORDER

SO ORDERED.

Dated: July 6, 2015



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

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