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14 ATTORNEYS FOR PLAINTIFFS AND
15 THE CLASS THEY SEEK TO REPRESENT

16 UNITED STATES DISTRICT COURT
17 FOR THE EASTERN DISTRICT OF CALIFORNIA

18 KOUROSH KENNETH HAMIDI, *et al.*, AND
19 THE CLASS THEY SEEK TO REPRESENT

20 Plaintiffs,

21 v.

22 SERVICE EMPLOYEES INTERNATIONAL
23 UNION LOCAL 1000, AND JOHN CHIANG,
24 Controller, State of California;

25 Defendants.

26 CASE NO.
27 2:14-CV-319-WBS-KJN

28 **CLASS ACTION**

**STIPULATION FOR
EXTENSION OF REMAINING
BRIEFING ON PARTIES'
CROSS-MOTIONS FOR
SUMMARY JUDGMENT**

29 TO THE COURT:

30 The parties to the above-captioned case hereby submit the following stipulation for extensions
31 on the remaining briefing on the parties' Cross-Motions for Summary Judgment (Docket Nos. 64, 67,
32 and 74), set for hearing on Monday, 6 February 2017, as follows:

33 WHEREAS, upon the briefing schedule agreed to among the parties and submitted to the Court
34 on 29 August 2016 (Docket No. 61), on 30 September 2016, Plaintiffs noticed their Motion for
35 Summary Judgment (Docket No. 64) to be heard on Monday, 6 February 2017; and

36 WHEREAS, on 31 October 2016, Defendants filed their Oppositions and Cross-Motions for

Summary Judgment (Docket Nos. 67 and 74); and

1 WHEREAS, Plaintiffs' undersigned counsel has come to the conclusion that, due to the press of
2 other matters (including three weekdays out of the office for day-long continuing legal education
3 seminars and the Thanksgiving holiday), the schedule previously agreed to does not allow adequate time
4 to respond to Defendants' Motions;
5

6 THEREFORE, the parties hereby stipulate and agree as follows:

7 1. The hearing on the parties' pending cross-motions for summary judgment shall remain on
8 the calendar for the noticed hearing date of Monday, 6 February 2017, at 2:00 p.m., as previously
9 agreed;

10 2. Plaintiffs' Opposition to Defendants' Cross-Motions for Summary Judgment, and Reply
11 to Defendants' Oppositions, shall be filed on or before Friday, 16 December 2016; and
12

13 3. Any replies in support of Defendants' summary judgment motions shall be filed on or
14 before Friday, 20 January 2017.

15 DATED: 23 November 2016

16 Respectfully submitted,

17 /s/ Steven R. Burlingham

/s/ W. James Young

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25 /s/ Mark R. Beckington (as authorized on
26 11/23/16)

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ATTORNEYS FOR DEFENDANT SEIU
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ORDER

IT IS SO ORDERED.

Dated: November 23, 2016



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

1 I, W. James Young, counsel for Plaintiffs, hereby certify that I electronically filed with the Clerk
2 of Court the foregoing **STIPULATION FOR EXTENSION OF REMAINING BRIEFING ON**
3 **PARTIES' CROSS-MOTIONS FOR SUMMARY JUDGMENT**, using the CM/ECF system which
4 will send notification of such filing to Defendants' counsel, this 23d day of November, 2016.
5

6 _____
7 /s/ W. James Young

8 W. JAMES YOUNG

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