

1 Stephen R. Jaffe SBN 48539  
2 The Jaffe Law Firm  
3 101 California Street, Suite 2710  
4 San Francisco, CA 94111  
5 stephen.r.jaffe@jaffetriallaw.com  
6 415.618.0100  
7 Attorneys for Relator TAMARA EVANS

8 McDOUGAL, LOVE, BOEHMER,  
9 FOLEY, LYON, CANLAS  
10 8100 La Mesa Boulevard, Suite 200  
11 La Mesa, CA 91942  
12 (619) 440-4444  
13 Attorneys for Defendant SOUTHERN  
14 CALIFORNIA INTERGOVERNMENTAL  
15 TRAINING AND DEVELOPMENT CENTER

16 UNITED STATES DISTRICT COURT  
17 EASTERN DISTRICT OF CALIFORNIA

18 UNITED STATES OF AMERICA *ex rel.*  
19 TAMARA EVANS,

20 Relator,

21 vs.

22 SOUTHERN CALIFORNIA  
23 INTERGOVERNMENTAL TRAINING AND  
24 DEVELOPMENT CENTER, *et al.*

25 Defendant.

Case No.: 2:15-cv-00619-MCE

**STIPULATION AND ORDER SETTING  
NEW DATE BY WHICH DISPOSITIVE  
MOTIONS MUST BE FILED.**

26 The parties stipulate to the following facts:

- 27 1. The present scheduling order (**Document 47**) requires the parties to file dispositive  
28 motions no later than 180 days from close of discovery on **September 20, 2019**, or by  
**March 18, 2020**.
2. Stephen R. Jaffe, counsel for the relator in this action, is lead counsel for the relators  
in *United States of America ex rel Rose et al. v Stephens Institute et al*, N. Dist. CA  
Case No. 09-CIV-5966-PJH ( hereafter “*US v AAU*”).

- 1 3. *US v. AAU* is in its eleventh year of litigation. It has been contentiously litigated in  
2 the District Court, the Ninth Circuit Court of Appeals and was the subject of an  
3 unsuccessful petition for writ of *certiorari* by the defendant in the United States  
4 Supreme Court.  
5  
6 4. *US v AAU* is set for jury trial on **May 5, 2020**. However, pretrial documents and  
7 materials are due to be filed with the District Court commencing **March 5, 2020**.  
8  
9 5. Under the present scheduling order, it is impossible for Mr. Jaffe to prepare for trial  
10 in *US v AAU* and, at the same time, prepare dispositive motions and/or oppose  
11 defendant's dispositive motion, if any, in this case.  
12  
13 6. No party will be prejudiced by the rescheduling order sought by this stipulation.  
14  
15 7. The parties agree this court may make an Order resetting the last date to file  
16 dispositive motions in this action from **March 18, 2020** to **July 15, 2020**.

17 McDOUGAL, LOVE, BOEHMER,  
18 FOLEY, LYON, CANLAS

17 THE JAFFE LAW FIRM

16 By: \_\_\_\_\_/s/\_\_\_\_\_  
17 John Petze  
18 Attorneys for Southern California  
19 Intergovernmental Training  
20 and Development Center

16 By: \_\_\_\_\_/s/\_\_\_\_\_  
17 Stephen R. Jaffe  
18 Attorneys for Realtor EVANS

19 **ORDER**

20 The foregoing stipulation having been presented to the Court and good cause appearing,  
21 the last day for the parties to file dispositive motions herein is continued from March 18, 2020 to  
22 **July 15, 2020**. All other dates set forth in the operative scheduling order remain in effect.  
23

24 IT IS SO ORDERED.

25 Dated: February 4, 2020

26   
27 MORRISON C. ENGLAND, JR.  
28 UNITED STATES DISTRICT JUDGE