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 6 Attorneys for Defendant
 CELLCO PARTNERSHIP D/B/A
 7 VERIZON WIRELESS

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 9 UNITED STATES DISTRICT COURT
 10 EASTERN DISTRICT OF CALIFORNIA

11
 12 CITY OF LOS ANGELES *ex rel.*
 RICHARD KNUDSEN,
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 14 Plaintiffs,
 15 vs.
 16 CELLCO PARTNERSHIP D/B/A VERIZON
 WIRELESS, and DOES 11-20,
 17
 18 Defendants.

Case No. 2:17-cv-00810-TLN-AC
STIPULATION TO EXTEND TIME FOR
DEFENDANT CELLCO PARTNERSHIP
D/B/A VERIZON WIRELESS TO FILE
MOTION TO DISMISS AND FOR
PLAINTIFF'S OPPOSITION; ORDER

1 **RECITALS**

2 Plaintiff City of Los Angeles (“Plaintiff”) and Defendant Cellco Partnership d/b/a Verizon
3 Wireless (“Verizon” or “Defendant”) (collectively the “Parties”) state as follows:

4 1. On September 9, 2016, the City of Los Angeles filed a Complaint in Intervention, in the
5 above-referenced matter, naming Cellco Partnership d/b/a Verizon Wireless and Does 11-20 as
6 Defendants in its case against Verizon (“Complaint”).

7 2. Defendant removed this action to this Court by filing a Notice of Removal on October 7,
8 2016, and Plaintiff moved to remand or, in the alternative, to transfer the case to the Eastern District of
9 California.

10 3. On April 17, 2017 the Honorable Dale S. Fischer denied Plaintiff’s motion to remand,
11 but granted Plaintiff’s alternative motion to transfer the matter to the Eastern District.

12 4. The parties previously agreed that Defendant’s motion to dismiss this case would be filed
13 on June 30, 2017, and that Plaintiff’s opposition would be due on August 11, 2017. *See* ECF No. 64.

14 5. Counsel for Plaintiff and counsel for Defendant have met and conferred regarding the
15 current deadline for Defendant to file its motion to dismiss and the briefing schedule, and due to an
16 emergent matter, the parties have agreed to a very brief extension of dates for their initial filings. These
17 brief extensions will have no impact on the date for Defendant’s reply brief, which shall remain due on
18 August 24, 2017, as set forth in the parties’ Rule 26(f) Report, nor will it impact the hearing date, which
19 remains September 7, 2017.

20 6. The parties also do not seek to alter the briefing schedule in the two cases related to this
21 matter.

22 7. The parties shall not file any further requests for extensions relating to Defendant’s
23 motion to dismiss.

24 **STIPULATION**

25 It is hereby stipulated and agreed between the Parties as follows that:

26 8. Defendant has up to and including July 6, 2017 to file its motion to dismiss.

27 9. Plaintiff’s opposition will be due on August 17, 2017.

28 10. Defendant’s reply will be due on August 24, 2017.

1 11. Given the above, the lack of prejudice to either side, and the retention of the date for (i)
2 Defendant's reply brief and (ii) the hearing date of September 7, 2017 and for cause, the Parties
3 respectfully request that the Court approve this Stipulation and order that Defendant's motion to dismiss
4 be due by July 6, 2017 and Plaintiff's opposition to Defendant's motion to dismiss be due August 17,
5 2017.

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7 Dated: June 29, 2017

Respectfully submitted,

8 GREENBERG TRAUERIG LLP

9
10 By: /s/Kurt A. Kappes

Kurt A. Kappes

Attorneys for Defendant

11 CELLCO PARTNERSHIP D/B/A

12 VERIZON WIRELESS

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14 Dated: June 29, 2017

COTCHETT, PITRE & McCARTHY LLP

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16 By: /s/ Eric J. Buescher (as authorized 6/29/17)

ERIC J. BUESCHER

Attorneys for Plaintiff

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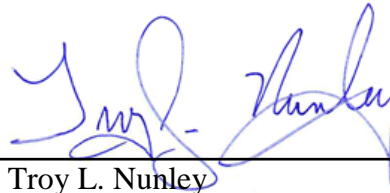
1 **ORDER**

2 The Court, having reviewed the stipulation to extend time for Defendant to file its motion to
3 dismiss orders as follows:

- 4 1. Defendant has up to and including July 6, 2017 to file a motion to dismiss.
5 2. Plaintiff's opposition will be due on August 17, 2017.
6 3. Defendant's reply will be due on August 24, 2017

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8 IT IS SO ORDERED

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10 Date: June 29, 2017

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Troy L. Nunley
United States District Judge