

1 WHEREAS, Plaintiffs have noticed a motion for sanctions against City of Oakland
2 Police Officer, J. Hargraves, and City of Oakland Police Lieutenant, C. Wong, to be heard on
3 January 9, 2012;

4 WHEREAS, under the current briefing schedule, any opposition to said motion must be
5 filed by Monday, November 28, 2011 and any reply to said motion would be due on Monday,
6 December 5, 2011;

7 WHEREAS, the Defendant City of Oakland, Officer Hargraves and Lt. Wong have not
8 yet reached an agreement concerning whether the City of Oakland will provide separate legal
9 counsel to Officer Hargraves and/or Wong because of any conflict of interest its current counsel
10 may have in representing Officer Hargraves and Lt. Wong in this matter and said parties need
11 additional time to resolve that issue before opposition(s) to Plaintiffs' motion can be filed;

12 WHEREAS, the undersigned counsel for the City of Oakland, Special Counsel for
13 Officer Hargraves and Lt. Wong and counsel for the Intervenor, Oakland Police Officers
14 Association, understand that Plaintiffs' counsel will be unavailable after 12:00 p.m. on
15 November 23, 2011, to engage in any further meet and confer discussions concerning any
16 amendment to the briefing schedule due and/or to participate in the filing of this stipulation
17 and/or other Court documents concerning this issue;

18 WHEREAS, the undersigned counsel for Officer Hargraves and Lt. Wong are not making
19 a general appearance for these parties at this time, but are appearing at this time for the limited
20 purpose of requesting that the Court amend the briefing schedule to provide Defendant City of
21 Oakland, Officer Hargraves and Lt. Wong additional time to resolve the issue of whether conflict
22 counsel will be provided to Officer Hargraves and Lt. Wong,

23 IT IS HEREBY STIPULATED AND AGREED THAT the briefing schedule on
24 Plaintiffs' motion for sanctions against Officer Hargraves and Lt. Wong should be amended to
25 permit them to have additional time to resolve the issue of their legal representation in this matter
26 to wit: any opposition to Plaintiffs' motion would be due on or before December 12, 2011, and

1 any reply to said motion would be due on or before December 19, 2011. This Stipulation would
2 have no other effect on the hearing date of the motion absent a further Order from this Court or
3 upon any other dates currently set by the Court in this matter.

4 IT IS SO STIPULATED:

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6 Dated: December 1, 2011

7 /S/ _____
James B. Chanin and John L. Burris
Attorneys for Plaintiffs

8 Dated: December 1, 2011

9 /S/ _____
Justin Buffington
Rains Lucia Stern, PC
2300 Contra Costa Blvd. Suite 500
Pleasant Hill, CA 94523
PH: 925.609.1699 FX: 925.609.1690
Specially Appearing for J. Hargraves and C. Wong

10
11
12 Dated: December 1, 2011

13 /S/ _____
Gregory M. Fox
Attorney for Defendant
City of Oakland

14
15 Dated: December 1, 2011

16 /S/ _____
Rockne A. Lucia
Attorney for Intervenor
Oakland Police Officers Association

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18 PURSUANT TO STIPULATION,
19 IT IS SO ORDERED:

20 Dated: December 1, 2011

21 _____
Thelton E. Henderson
Judge of the Court
