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7 Attorneys for Defendant: CITY AND COUNTY OF SAN FRANCISCO
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

10 MERCY AMBAT, et al.,
 11 Plaintiffs,
 12 vs.
 13 CITY AND COUNTY OF SAN FRANCISCO,
 14 Defendant.

Case No. CVC 07—3622 S1

**CITY AND COUNTY OF SAN
 FRANCISCO'S MOTION FOR
 ADMINISTRATIVE RELIEF FROM
 BRIEF PAGE LIMITATION;
 [PROPOSED] ORDER**

15 Also consolidated into this action are:

16 PAMELA WALKER, et al.,
 17 Plaintiffs,
 18 vs.
 19 CITY AND COUNTY OF SAN FRANCISCO,
 20 Defendant

Case No. CVC 08—2406 S1

21 MARTHA ORTEGA,
 22 Plaintiff,
 23 vs.
 24 CITY AND COUNTY OF SAN FRANCISCO,
 25 Defendant.

Case No. CV 09-2652 S1

1 **DISCUSSION**

2 The City is seeking administrative relief under Local Rule 7-11 from the 25-page limitation
3 that would otherwise apply to its upcoming motion for summary judgment. The City reasonably
4 requires a longer brief to adequately address all the legal and factual issues presented in this case.
5 The City asked the Plaintiffs to stipulate to an order permitting the parties to file briefs exceeding the
6 25 page limit, but the Plaintiffs refused. (R. Ofierski Dec. ¶ 3.)

7 This is a consolidated and complex action concerning the validity of a policy precluding male
8 Sheriff's Deputies from supervising female inmates in the San Francisco women's jail. The Plaintiffs
9 are eleven male Deputies and twenty-three female Deputies. All Plaintiffs contend that the policy
10 constitutes unlawful gender discrimination under Title VII and the California Fair Employment and
11 Housing Act ("FEHA"). As grounds for this claim, the male Plaintiffs and the female Plaintiffs
12 proffer largely separate, gender-specific sets of allegations concerning the policy's allegedly adverse
13 effects. Five Plaintiffs also allege causes of action for retaliation for protected activity under Title
14 VII and FEHA. Two Plaintiffs additionally allege a "whistleblower" cause of action under California
15 Labor Code Section 1102.5(b). Finally, one Plaintiff alleges a cause of action for violation of the
16 California Peace Officers' Procedural Bill of Rights. In sum, the thirty-four Plaintiffs assert nine
17 separate causes of action based on extensive factual allegations. The Plaintiffs' complaint itself
18 numbers thirty-three pages containing one hundred forty nine paragraphs. (See Third Amended &
19 Consolidated Complaint for Damages and Injunctive Relief). In discovery, the parties conducted
20 dozens of depositions and exchanged tens of thousands of pages of documents. (R. Ofierski
21 Dec. ¶ 2.)

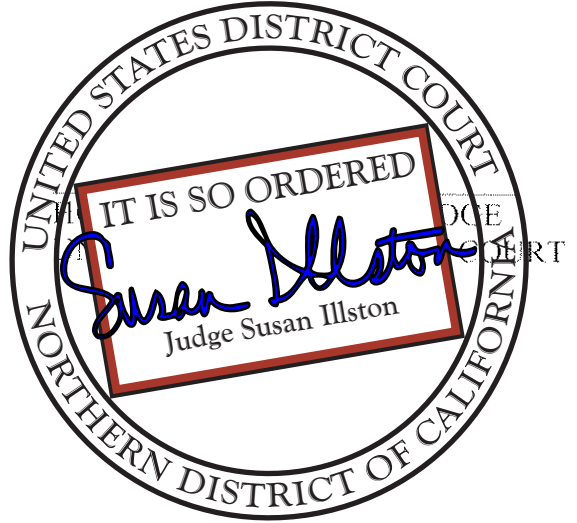
22 The City is preparing a motion for summary adjudication, which is due on January 8, 2010.
23 In the course of preparing the motion, the City has concluded that it reasonably cannot address all the
24 legal and factual issues in a twenty-five page brief. Responding to the gender-discrimination claims
25 alone requires lengthy legal analysis involving numerous factual aspects of City jail operations,
26 including jail design, staffing, jail staff duties, inmate populations, as well as the various alleged
27 effects of the challenged policy on the terms and conditions of Deputies' employment, such as
28 overtime earnings, work assignments, and the working conditions in the women's jail. Additionally,

PROPOSED ORDER

The City has submitted a motion for administrative relief regarding the page limit for its upcoming motion for summary adjudication. Good cause appearing, the Court hereby GRANTS the motion. Accordingly, the City is hereby permitted to file a summary judgment brief of up to 40 pages in length.

SO ORDERED.

Dated: 1/13/10



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