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Attorneys for Plaintiffs JEWS FOR JESUS, INC., and MR. ROBERT WERTHEIM

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JEWS FOR JESUS, INC.,)
a California non-profit corporation,)
MR. ROBERT WERTHEIM,)
as an individual)
and as an employee of)
JEWS FOR JESUS, INC.,)

Plaintiffs,)

vs.)

CITY COLLEGE OF)
SAN FRANCISCO, and)
CHARLTON FOTCH, as an)
individual,)

Defendants.)

Case No: CV 08-03876 MHP

**STIPULATION FOR ENTRY OF
ORDER EXTENDING TIME TO FILE
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND COSTS AND
PLAINTIFFS' BILL OF COSTS**

Stipulation for Entry of Order Extending Time to File Plaintiffs' Motion for Attorneys' Fees and
Costs and Plaintiffs' Bill of Costs - Page 1

Case No: CV 08-03876 MHP Jews for Jesus, et al. v. City College of San Francisco

1 COME NOW the parties, Plaintiffs, JEWS FOR JESUS, INC., and MR. ROBERT
2 WERTHEIM (hereinafter "Plaintiffs"), and Defendants SAN FRANCISCO COMMUNITY
3 COLLEGE DISTRICT a/k/a CITY COLLEGE OF SAN FRANCISCO, and CHARLTON
4 FOTCH (hereinafter "Defendants"), by and through their undersigned counsel, pursuant to Local
5 Rule 6-2, and file the parties' Stipulation for Entry of Order Extending Time to File Plaintiffs'
6 Motion for Attorneys' Fees and Costs and Plaintiffs' Bill of Costs.

7 The parties reached a verbal agreement to resolve Plaintiffs' attorneys' fees and costs and
8 request a brief extension of time to complete the necessary documents. Pursuant to Local Rule
9 6-2, the parties respectfully request this Court to enter an Order granting this Stipulation and
10 extend the deadline for Plaintiffs' Motion for Attorneys' Fees and Costs and Plaintiffs' Bill of
11 Costs until Thursday, June 7, 2009.

12 **WHEREFORE**, the parties respectfully request this Court to grant the parties'
13 Stipulation for Entry of Order Extending Time to File Plaintiffs' Motion for Attorneys' Fees and
14 Costs and Plaintiffs' Bill of Costs until June 7, 2009. Each party reserves all rights relative to
15 any Motion for Attorneys' Fees and Costs that may be filed, if necessary.

16
17 **MEMORANDUM OF LAW**

18 Pursuant to Local Rule 54-1 and Local Rule 54-6, the deadline for Plaintiffs' Motion for
19 Attorneys' Fees and Costs and Plaintiffs' Bill of Costs is fourteen (14) days from the entry of
20 Judgment. Judgment was entered on Wednesday, April 15, 2009. The time to file Plaintiffs'
21 Motion for Attorneys' Fees and Costs and Plaintiffs' Bill of Costs has not expired.

22 The parties reached a verbal agreement to resolve Plaintiffs' attorneys' fees and costs and
23 request a brief extension of time to complete the necessary documents. Pursuant to Local Rule
24 6-2, the parties respectfully request this Court to enter an Order granting this Stipulation and
25 extend the deadline for Plaintiffs' Motion for Attorneys' Fees and Costs and Plaintiffs' Bill of
26 Costs until Thursday, June 7, 2009.

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28 Stipulation for Entry of Order Extending Time to File Plaintiffs' Motion for Attorneys' Fees and

Costs and Plaintiffs' Bill of Costs - Page 2

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of April 2009, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I further certify that I either mailed the foregoing document and the Notice of Electronic Filing by first class mail to any non CM/ECF participants and/or the foregoing document was served via transmission of Notice of Electronic Filing generated by CM/ECF to any and all active CM/ECF participants.

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Kathleen Darmagnac, Esq.
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Louis A. Leone, Esq. (CSB # 099874)
Kathleen Darmagnac, Esq. (CSB # 150843)
Attorneys for Defendants

Respectfully submitted this 24th day of April 2009.

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s/Frederick H. Nelson
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Stipulation for Entry of Order Extending Time to File Plaintiffs' Motion for Attorneys' Fees and
Costs and Plaintiffs' Bill of Costs - Page 4

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8
9 Attorneys for Plaintiffs JEWS FOR JESUS, INC., and MR. ROBERT WERTHEIM

10
11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

13 JEWS FOR JESUS, INC.,)
14 a California non-profit corporation,)
15 MR. ROBERT WERTHEIM,)
16 as an individual)
17 and as an employee of)
18 JEWS FOR JESUS, INC.,)
19 Plaintiffs,)
20 vs.)
21 CITY COLLEGE OF)
22 SAN FRANCISCO, and)
23 CHARLTON FOTCH, as an)
24 individual,)
25 Defendants.)
26)
27)
28)

Case No: CV 08-03876 MHP

**PLAINTIFFS' DECLARATION OF
FREDERICK H. NELSON
SUPPORTING STIPULATION FOR
ENTRY OF ORDER EXTENDING
TIME TO FILE PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES AND COSTS
AND PLAINTIFFS' BILL OF COSTS**

1 FREDERICK H. NELSON declares:

- 2 1. I am an attorney representing Plaintiffs in this action. The matters stated in this
3 Declaration are personally known to me. If called upon to testify under oath, I could and
4 would competently testify to the following facts.
- 5 2. Pursuant to Local Rule 6-2(a), Plaintiffs' counsel states:
- 6 a. The parties reached a verbal agreement to resolve Plaintiffs' attorneys' fees and
7 costs and request a brief extension of time to complete the necessary documents.
- 8 b. No previous extensions of time have been requested or granted for Plaintiffs'
9 Motion for Attorneys' Fees and Costs and Plaintiffs' Bill of Costs.
- 10 c. The requested extension of time will have no effect upon any Court scheduling.
- 11 3. On Friday, April 24, 2009, I submitted the parties' Stipulation for Entry of Order
12 Extending Time to File Plaintiffs' Motion for Attorneys' Fees and Costs and Plaintiffs'
13 Bill of Costs to Defendants' counsel. Defendants' counsel respond with approval to
14 submit the Stipulation for Entry of Order Extending Time to File Plaintiffs' Motion for
15 Attorneys' Fees and Costs and Plaintiffs' Bill of Costs.

16 I declare under penalty of perjury under the laws of the State of California and Florida
17 and of the United States that the foregoing is true and correct, and that this Declaration is
18 executed this 24th day of April, 2009, at Clermont, Florida.

19 DATED: April 24, 2009

20 Respectfully submitted,

21 **AMERICAN LIBERTIES INSTITUTE**

22 s/Frederick H. Nelson
23 Frederick H. Nelson, Esq.
24 (Lead Trial Counsel)
25 Florida Bar No. 0990523
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Attorneys for Defendants

Respectfully submitted this 24th day of April 2009.

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CHARLTON FOTCH, as an)
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Defendants.)
_____)

Case No: CV 08-03876 MHP

**[PROPOSED] ORDER GRANTING
STIPULATION FOR ENTRY OF
ORDER EXTENDING TIME TO FILE
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND COSTS AND
PLAINTIFFS' BILL OF COSTS**

[Proposed] Order Granting Stipulation for Entry of Order Extending Time to File Plaintiffs'

Motion for Attorneys' Fees and Costs and Plaintiffs' Bill of Costs - Page 1

Case No: CV 08-03876 MHP Jews for Jesus, et al. v. City College of San Francisco

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MEMORANDUM AND ORDER

The Court, having read and considered the parties' Stipulation for Entry of Order Extending Time to File Plaintiffs' Motion for Attorneys' Fees and Costs and Plaintiffs' Bill of Costs, finds that good cause exists to grant the Stipulation, and thereby orders as follows:

1. PURSUANT TO STIPULATION, IT IS SO ORDERED.

2. The deadline for Plaintiffs' Motion for Attorneys' Fees and Costs and Plaintiffs' Bill of Costs is extended until Thursday, June 7, 2009.

IT IS SO ORDERED.

Date: aPRIL 28 , 2009



[Proposed] Order Granting Stipulation for Entry of Order Extending Time to File Plaintiffs'

Motion for Attorneys' Fees and Costs and Plaintiffs' Bill of Costs - Page 2