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12 Attorneys for Plaintiff

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA

15 RON E. REYNOLDS,

16 Plaintiff,

17 vs.

18 CITY AND COUNTY OF SAN
 19 FRANCISCO, a public entity, SYDNEY
 LAWS, PADGET MITCHELL, HEATHER
 20 FONG, JAMES LYNCH, and Does 1 through
 100, inclusive,

21 Defendants.

Case No. C 09-0301 RS

**STIPULATION AND [PROPOSED] ORDER
 CONTINUING DISCOVERY AND CASE
 MANAGEMENT DATES PENDING RULING
 ON DEFENDANTS' MOTION TO DISMISS
 AS MODIFIED BY THE COURT**

23
 24 The parties, Plaintiff Ron E. Reynolds ("Plaintiff"), and Defendants City and County of San
 25 Francisco, Sydney Laws, Padget Mitchell, Heather Fong, and James Lynch (collectively,
 26 "Defendants"), by and through their attorneys of record, hereby stipulate and request that the Court
 27 continue discovery and related case management dates in this action for six months, as the parties
 28

1 believe that it does not make sense for depositions and/or other discovery to go forward further until
2 the Court rules on Defendants' pending motion to dismiss, as this ruling will dramatically affect the
3 scope of claims and facts at issue in this lawsuit. (This motion was filed on April 1, 2011 and heard on
4 May 12, 2011.)

5 Both parties believe that, until the Court rules on the pending motion and determines the scope
6 of factual and legal issues that will need to be addressed and resolved in this case, it would be
7 potentially very wasteful in moving forward with further discovery at this time.

8 This is the first stipulation and proposed order to continue discovery and subsequent case
9 management deadlines in this case.

10 The parties thus jointly request that the Court continue the discovery deadline and all
11 subsequent case management deadlines in this action by six months.

13 Dated: August 30, 2011

Respectfully submitted,

DENNIS J. HERRERA
City Attorney
ELIZABETH SALVESON
Chief Labor Attorney
ANDREW GSCHWIND
Deputy City Attorney

18 By: _____/s./_____
19 ANDREW GSCHWIND

20 Attorneys for Defendants

21 Dated: August 30, 2011

Respectfully submitted,

MURRAY & ASSOCIATES

23 By: _____/s./_____
24 LAWRENCE D. MURRAY¹

25 Attorneys for Plaintiff

27 _____
28 ¹ Per General Order 45, section X.B., defense counsel hereby attests that he has obtained the concurrence, consent and authorization of Mr. Murray's office to file this document on his behalf.

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[PROPOSED] ORDER

Good cause appearing from the Parties' stipulation, the Court hereby continues ~~discovery and~~
~~all subsequent case management deadlines in this action six months for _____] [to be~~
~~completed by Court].~~ THE DEADLINE TO COMPLETE FACT DISCOVERY TO DECEMBER 30, 2011
ALL OTHER DATES AND DEADLINES REMAIN IN PLACE.

SO ORDERED.

Date: 9/1/11



The Honorable Richard Seeborg
UNITED STATES DISTRICT COURT JUDGE