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25 UNITED STATES DISTRICT COURT
 26 NORTHERN DISTRICT OF CALIFORNIA
 27 SAN FRANCISCO DIVISION

28 CITY AND COUNTY OF SAN
 FRANCISCO, CENTRAL CITY SRO
 COLLABORATIVE, SAN FRANCISCO
 TENANTS UNION, and HOUSING RIGHTS
 COMMITTEE OF SAN FRANCISCO

Case No. C09-1964 RS

STIPULATION AND ~~PROPOSED~~ ORDER
 REGARDING DEADLINE FOR MOTIONS
 TO COMPEL FACT DISCOVERY

Plaintiffs,

vs.

UNITED STATES POSTAL SERVICE,

Defendant.

1 BY AND THROUGH THEIR COUNSEL OF RECORD, THE PARTIES STIPULATE AS
2 FOLLOWS:

- 3 1. The last day for either plaintiffs or defendant to file a motion to compel further fact
4 discovery, as provided in this stipulation, is extended by agreement from June 2, 2011
5 to June 9, 2011. This extension will enable the parties to further meet and confer on
6 numerous outstanding issue and reduce and perhaps eliminate the issues which may
7 require a motion to compel.
- 8 2. The discovery requests subject to the agreement of the parties described in this
9 stipulation are the following:
 - 10 a. Plaintiff San Francisco Tenants Union's Interrogatories to Defendant USPS,
11 Set #1;
 - 12 b. Plaintiff City and County of San Francisco's Requests for Admission to
13 Defendant USPS, Set #2;
 - 14 c. Defendant's Requests for Admission to Plaintiff San Francisco Tenants Union,
15 Set #2;
 - 16 d. Defendant's Requests for Admission to Plaintiff Central City SRO
17 Collaborative, Set #2;
 - 18 e. Defendant's Requests for Admission to Plaintiff Housing Rights Committee of
19 San Francisco, Set #2;
 - 20 f. Defendant's Requests for Admission to Plaintiff City and County of San
21 Francisco, Set #1;
 - 22 g. Defendant USPS' Interrogatories to Plaintiff City and County of San
23 Francisco, Set #3;
 - 24 h. Defendant USPS' Requests for Production to Plaintiff City and County of San
25 Francisco, Set #4;
 - 26 i. Defendant USPS' Requests for Production to Plaintiff Central City SRO
27 Collaborative, Set #2;
 - 28 j. Defendant USPS' Requests for Production to Plaintiff Housing Rights

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Committee of San Francisco, Set #2;

k. Defendant USPS' Requests for Production to Plaintiff San Francisco Tenants Union, Set #2;

l. Plaintiffs' request for additional deposition testimony by Postal Service employee Raj Sanghera; and

m. Topic No. 2 of Defendant's 30(b)(6) deposition notice served on CCSF and related written discovery requests, including Requests for Production Nos. 5, 12, 36, 41, 45 and 48 and Interrogatory Nos. 26, 29 and 31 served on CCSF.

3. The parties previously agreed to extend the time for their responses to the discovery requests identified in paragraphs (2)(a) through (2)(k) from May 26, 2011 to June 1, 2011. Counsel for defendant requested the short extension due to a personal family emergency for one of the defense team members, and counsel for Plaintiffs agreed as a professional courtesy provided that the deadline would be reciprocal.

4. The parties make this agreement to facilitate any meet and confer efforts that may be necessary following service of the responses on June 1, 2011.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED: June 2, 2011

MELINDA HAAG
United States Attorney

By: /s/ Jonathan U. Lee
JONATHAN U. LEE
Assistant U.S. Attorney
COUNSEL FOR THE UNITED STATES OF AMERICA

Dated: June 2, 2011

COVINGTON & BURLING LLP

By: /s/ Kelly P. Finley
MICHAEL M. MARKMAN
KELLY P. FINLEY
JOSHUA D. HURWIT

Attorneys for Plaintiffs
CITY AND COUNTY OF SAN FRANCISCO,

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CENTRAL CITY SRO COLLABORATIVE, SAN FRANCISCO TENANTS UNION, and HOUSING RIGHTS COMMITTEE OF SAN FRANCISCO COUNTY

Dated: June 2, 2011

DENNIS J. HERRARA, CITY ATTORNEY

By: /s/ Sherri S. Kaiser
SHERRI SOKELAND KAISER
TARA M. STEELEY

Attorneys for Plaintiff
CITY AND COUNTY OF SAN FRANCISCO

TENDERLOIN HOUSING CLINIC

DATED: June 2, 2011

By: /s/ Stephen L. Collier
STEPHEN L. COLLIER
Attorneys for Plaintiffs
CENTRAL CITY SRO COLLABORATIVE, SAN FRANCISCO TENANTS UNION, and HOUSING RIGHTS COMMITTEE OF SAN FRANCISCO COUNTY

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: June 3 , 2011


HON. ELIZABETH D. LAPORTE
United States Magistrate Judge