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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
 Plaintiffs,
 vs.
 UNITED STATES POSTAL SERVICE,
 Defendant.

Case No. C09-1964 RS
 STIPULATION AND ~~PROPOSED~~ ORDER REGARDING DEADLINE FOR DISCOVERY MOTIONS RE: FACT DISCOVERY

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

- 3
- 4 1. The parties continue to meet and confer regarding Topic No. 2 of Defendant's
5 30(b)(6) deposition notice served on CCSF and the following written discovery
6 requests to the extent they relate to Topic No. 2: Requests for Production Nos. 5, 12,
7 36, 41, 45, 48, 89, 93-94, 97-100 and 102, Interrogatory Nos. 26, 29, 31 and 32 and
8 Requests For Admission Nos. 3-4, 7, 45-51, 77, 92, 123-184 served on CCSF.
9 Though outstanding issues remain, the parties continue to meet and confer regarding
10 these issues and are making progress in eliminating issues the Court may otherwise
11 need to address.
- 12 2. Defendant will make Raj Sanghera available for additional deposition testimony
13 regarding topics about which she was previously instructed not to testify. The parties
14 continue to meet and confer regarding the schedule for Ms. Sanghera's additional
15 deposition. The deadline for Plaintiffs to move to compel additional testimony from
16 Ms. Sanghera shall be the same deadline as set forth in paragraph 4.
- 17 3. The current deadline by which the parties may file a discovery motion relating to these
18 matters is Thursday June 9, pursuant to the stipulation and proposed order signed by
19 the Court on June 3.
- 20 4. To provide the parties sufficient time to take depositions and attempt to resolve any
21 outstanding issues covered by these discovery requests, the parties agree to extend the
22 time to move to compel or preclude any fact discovery relating to these requests until
23 one week following the last Topic 2 deposition.

24 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

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DATED: June 9, 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 9, 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,
CENTRAL CITY SRO COLLABORATIVE, SAN
FRANCISCO TENANTS UNION, and HOUSING
RIGHTS COMMITTEE OF SAN FRANCISCO
COUNTY

Dated: June 9, 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

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: June 13, 2011

HON. _____
United States District Court

