

E-Filed 6/22/11

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

22 CITY AND COUNTY OF SAN
 23 FRANCISCO, CENTRAL CITY SRO
 24 COLLABORATIVE, SAN FRANCISCO
 25 TENANTS UNION, and HOUSING RIGHTS
 26 COMMITTEE OF SAN FRANCISCO
 27 Plaintiffs,
 28 vs.
 29 UNITED STATES POSTAL SERVICE,
 30 Defendant.

Case No. C09-1964 RS

STIPULATION AND [~~PROPOSED~~] ORDER
 REGARDING ACCELERATED BRIEFING
 SCHEDULE ON DEFENDANT'S MOTION TO
 MODIFY SCHEDULING ORDER AND
 PLAINTIFFS' MOTION FOR A STAY

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

3 WHEREAS, the Postal Service intends to file a motion to modify the scheduling
4 order to continue the deadline to file dispositive motions (currently set for June 30) for four
5 weeks until July 28 so that all discovery disputes are resolved and all expert discovery is
6 completed prior to the filing of dispositive motions. The Postal Service does not seek a
7 continuance of the trial date. Plaintiffs do not agree to a modification of the scheduling order.

8 WHEREAS, on May 18, 2011, Plaintiffs filed a complaint before the Postal
9 Regulatory Commission and intend to file a motion to stay this district court action. The Postal
10 Service does not agree to a stay of this action.

11 WHEREAS, the parties have agreed to a shortened briefing schedule on both
12 issues. The schedule is as follows:

- 13 - All parties will file their respective motions by today at 4:00.
- 14 - All parties will file their oppositions by tomorrow at 4:00.
- 15 - The parties are available to appear before the Court on Friday, June 24, if
16 the Court wishes to hear oral argument.

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

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1 DATED: June 22, 2011

MELINDA HAAG
United States Attorney

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

7 Dated: June 22, 2011

COVINGTON & BURLING LLP

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

11 Attorneys for Plaintiffs
12 CITY AND COUNTY OF SAN FRANCISCO,
13 CENTRAL CITY SRO COLLABORATIVE, SAN
FRANCISCO TENANTS UNION, and HOUSING
RIGHTS COMMITTEE OF SAN FRANCISCO
COUNTY

14 Dated: June 22, 2011

DENNIS J. HERRARA, CITY ATTORNEY

15
16 By: /s/ Sherri S. Kaiser
SHERRI SOKELAND KAISER
17 TARA M. STEELEY

18 Attorneys for Plaintiff
19 CITY AND COUNTY OF SAN FRANCISCO

20 **[PROPOSED] ORDER**

21 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

22
23 Defendant's motion to modify the scheduling order is due today at 4:00 p.m. Plaintiffs'
24 motion for a stay is due today at 4:00 p.m. The parties' Oppositions to each other's respective
25 motions are due tomorrow by 4:00. The Court will notify the parties if oral argument is
26 necessary.

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DATED: June 22, 2011


HON. RICHARD SEEBORG
United States District Court Judge