

1 DENNIS J. HERRERA, State Bar #139669
 City Attorney
 2 DANNY CHOU, State Bar # 180240
 Chief of Complex and Special Litigation
 ELAINE M. O'NEIL, State Bar #142234
 3 Deputy City Attorney
 Fox Plaza
 4 1390 Market Street, Seventh Floor
 San Francisco, California 94102-5408
 5 Telephone: (415) 554-3881
 Facsimile: (415) 554-3985
 6 E-Mail: elaine.o'neil@sfgov.org

7
 8 Attorneys for Defendants
 CITY AND COUNTY OF SAN FRANCISCO, ET AL.

9
 10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA, *Ex Rel.*
 13 PRAM NGUYEN,

Case No. CV09-3934 BZ

14 Plaintiff,

**STIPULATION RE TIME TO RESPOND TO
 COMPLAINT AND CASE MANAGEMENT
 CONFERENCE AND [PROPOSED] ORDER**

15 Bringing this action on behalf of the
 United States of America

Trial Date: None set

16 vs.

17 THE CITY AND COUNTY OF SAN
 FRANCISCO; and the SAN FRANCISCO
 18 AIRPORT COMMISSION,

19 Defendants.

20
 21
 22 WHEREAS Plaintiff Pram Nguyen has sued Defendants City and County of San Francisco and
 23 the San Francisco Airport Commission (collectively, the "City"), alleging causes of action under the
 24 Clean Air Act and the False Claims Act;

25 WHEREAS Plaintiff served the City with the complaint on August 27, 2010;

26 WHEREAS, the City currently must answer or otherwise respond to the complaint by
 27 September 16, 2010;

1 WHEREAS the Court has scheduled a case management conference in this matter for
2 November 19, 2010 at 10:00 a.m.;

3 WHEREAS Plaintiff has agreed to give the City an additional 30 days to respond to the
4 complaint and, as a result, the City would have until October 18, 2010 to answer or otherwise respond
5 to the complaint; and

6 WHEREAS in light of the additional time given by Plaintiff to the City to respond to the
7 complaint, Plaintiff and the City agree that the case management conference should be continued until
8 January 2011.

9 NOW THEREFORE THE CITY AND PLAINTIFF HEREBY STIPULATE that:

10 1. The City shall have until October 18, 2010 to answer or otherwise respond to the
11 complaint; and

12 2. The case management conference scheduled for November 19, 2010 at 10:00 a.m. shall
13 be continued to January 7, 2011 at 10:00 a.m.

14 Dated: 9-8-, 2010


15 LENDRUM LAW FIRM
16 JEFFREY P. LENDRUM (137751)

17 By: 
18 Jeffrey P. Lendrum

19 Attorneys for Plaintiff's UNITED STATES OF
20 AMERICA, Ex Rel. PRAM NGUYEN

21 Dated: Sept 8, 2010

22 DENNIS J. HERRERA
23 CITY ATTORNEY
24 DANNY CHOU (180240)

25 By: 
26 Danny Chou

27 Attorneys for Defendant
28 CITY AND COUNTY OF SAN FRANCISCO
and the SAN FRANCISCO AIRPORT
COMMISSION



Pursuant to the parties' stipulation and good cause appearing, IT IS SO ORDERED.

Dated: _____, 2010

UNITED STATES DISTRICT JUDGE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28