1	JEFFER MANGELS BUTLER & MITCHELL LLP				
2	BENJAMIN M. REZNIK (Bar No. 72364)  bmr@jmbm.com				
3	MATTHEW D. HINKS (Bar No. 200750)  mhinks@jmbm.com AMY LERNER HILL (Bar No. 216288)				
4	akl(a)jmbm.com				
5	1900 Avenue of the Stars, Seventh Floor Los Angeles, California 90067-4308				
6	Los Angeles, California 90067-4308 Telephone: (310) 203-8080 Facsimile: (310) 203-0567				
7	Attorneys for Plaintiff CONTEST PROMOTIONS, LLC				
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10	UNITED STATES DISTRICT COURT				
11	NORTHERN DISTRICT OF CALIFORNIA				
12	CONTECT DROMOTIONS I.I.C.	CACENO CVIONAMA CI			
13	CONTEST PROMOTIONS, LLC, a California limited liability company,	CASE NO. CV 09-4434 SI			
14	Plaintiff,	STIPULATION RE CONTINUANCE OF PRETRIAL AND TRIAL DATES			
15	V.	AND [PROPOSED] ORDER			
16	CITY OF SAN FRANCISCO, a				
17	municipal corporation; COUNTY OF SAN FRANCISCO, a subdivision of the State of California; CITY AND				
18	LCOUNTY OF SAN FRANCISCO, a				
19	chartered California city and county; and DOES 1 through 10, inclusive,				
20	Defendants.				
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#### **STIPULATION**

- 1. Pursuant to Fed. R. Civ. Proc. 16 and the Local Rules of this Court, plaintiff Contest Promotions, LLC and defendants City and County of San Francisco (collectively, the "parties"), through their respective counsel of record, respectfully submit the following stipulation requesting an extension of the pre-trial and trial dates.
- 2. On February 4, 2010, the Court issued its Pretrial Preparation Order, which set the pretrial dates in this matter (Dkt. # 23).
- 3. On October 5, 2010, the Court held a Case Management Conference and continued certain of the pretrial dates in this matter. These new dates are reflected in the Court's October 8, 2010 Civil Pretrial Minutes (Dkt. # 40).
- 4. The parties currently have several outstanding and incomplete discovery items, including the depositions of their respective witnesses. The parties will not be able to complete discovery or resolve their outstanding discovery disputes before the January 19, 2011 fact discovery cut-off.
- 5. The parties now seek to continue all case management dates to allow them additional time to complete discovery and further meet and confer regarding outstanding discovery disputes. The parties must complete all discovery before their deadline to file dispositive motions. Therefore, the parties also seek to continue the dispositive motion deadlines. In addition, the parties seek to file and have heard their dispositive motions before preparing for the pretrial conference and trial. The parties therefore seek to also continue the pre-trial conference and trial dates.
- 6. The parties agree that all case management dates should be continued by approximately six weeks.
- 7. The parties agree to continue the current pretrial and trial dates as set forth below and respectfully request that the Court adopt these revised dates:

Jeffer Mangels Butler & Mitchell LLP	
JMBM	

1	CURRENT DATES:		
2	Non-Expert Discovery Cut-Off: January 19, 2011		
3	Designation of Experts: January 21, 2011		
4	Designation of Rebuttal Experts: February 4, 2011		
5	Expert Discovery Cut-Off: February 18, 2011		
6	Dispositive Motions, Filed: March 4, 2011		
7	Dispositive Motions, Oppositions: March 18, 2011		
8	Dispositive Motions, Reply: March 25, 2011		
9	Dispositive Motion Hearing Deadline: April 8, 2011 at 3:30 p.m.		
10	Pretrial Conference: May 24, 2011 at 3:30 p.m.		
11	Jury Trial: June 6, 2011 at 8:30 a.m.		
12			
13	PROPOSED NEW DATES:		
14	Non-Expert Discovery Cut-Off: March 4, 2011		
15	Designation of Experts: March 18, 2011		
16	Designation of Rebuttal Experts: April 1, 2011		
17	Expert Discovery Cut-Off: April 15, 2011		
18	Dispositive Motions, Filed: May 20, 2011		
19	Dispositive Motions, Oppositions: June 3, 2011		
20	Dispositive Motions, Replies: June 10, 2011		
21	Dispositive Motion Hearing Deadline: June 24, 2011 at 9:00 a.m.		
22	Pretrial Conference: July 26, 2011 at 3:30 p.m.		
23	Jury Trial: August 6, 2011 at 8:30 a.m.		
24			
25	8. There is good cause to continue the pretrial and trial dates		
26	because it will allow the parties to complete discovery in an orderly fashion in		
27	advance of their deadline to file dispositive motions. In addition, there is good cause		
28	to continue the pretrial and trial dates because it will allow the parties more time to		

## Case3:09-cv-04434-SI Document68 Filed01/10/11 Page4 of 6

	1	work on their outstanding discovery	and attempt to informally resolve their discovery	
	2	disputes without seeking the Court's intervention.		
	3	IT IS SO STIPULATED.		
	4			
	5	DATED: December 28, 2010	JEFFER MANGELS BUTLER & MITCHELL LLP	
	6		BENJAMIN M. REZNIK	
	7		MATTHEW D. HINKS AMY LERNER HILL	
	8			
	9		By: /s/ Matthew D. Hinks MATTHEW D. HINKS	
	10		Attorneys for Plaintiff CONTEST PROMOTIONS, LLC	
ILP	11	DATED: December 28, 2010	DENNIS J. HERRERA	
ıgels Yitchel	12		KRISTEN A. JENS THOMAS S. LAKRITZ	
er Man Ier & M	13		VICTORIA WONG	
	14			
$\mathbb{B}$	15		By: /s/ Thomas S. Lakritz THOMAS S. LAKRITZ	
m JMBM Jeffer Mangels Butler & Mitchell $^{ m LP}$	16		Attorneys for Defendant CITY AND COUNTY OF SAN FRANCISCO	
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### [PROPOSED] CASE MANAGEMENT ORDER

The parties' Stipulation re Continuance of Pretrial and Trial Dates is hereby adopted by the Court as the Case Management Order for the case and the parties are ordered to comply with this Order.

IT IS SO ORDERED:

Dated:

By:

HONORABLE SUSAN ILLSTON
United States District Court Judge

## **ATTESTATION CLAUSE**

I, Matthew Hinks, hereby attest in accordance with General Order No. 45.X that Thomas S. Lakrtiz, Counsel for Defendant City and County of San Francisco, has provided his concurrence with the electronic filing of the foregoing document entitled STIPULATION RE CONTINUANCE OF PRETRIAL AND TRIAL DATES AND [PROPOSED] ORDER.

DATED: December 28, 2010 By: /s/ Matthew D. Hinks

MATTHEW D. HINKS

Attorneys for Plaintiff

CONTEST PROMOTIONS, LLC.