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 7

8 **UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**
 10

11 BAYKEEPER, INC., d/b/a SAN
 12 FRANCISCO BAYKEEPER, a California
 non-profit corporation,

13 Plaintiff,

14 v.

15 CITY OF SAN BRUNO, a California
 16 municipal corporation,

17 Defendant.
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CASE NO. CV 10-00753 SC

**STIPULATION AND [PROPOSED]
 ORDER CONTINUING APRIL 29, 2011
 CASE MANAGEMENT CONFERENCE**

19 WHEREAS, the parties in this case are scheduled to attend a Case Management
 20 Conference before this Court on April 29, 2011, at 10:00 a.m.;

21 WHEREAS, the parties have reached general agreement on the terms of a consent decree
 22 and are in the process of resolving the two remaining issues;

23 WHEREAS, the parties anticipate that they will finalize the consent decree by June 10,
 24 2011, and therefore a Case Management Conference is not necessary at this time.

25 WHEREAS, the parties desire to continue the Case Management Conference to June 10,
 26 2011.

27 NOW, THEREFORE, the undersigned parties hereby stipulate that:
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1. The Case Management Conference currently set for April 29, 2011, will be continued until June 10, 2011 at 10:00 a.m. to allow the parties time to finalize the consent decree.

2. The parties shall file a joint case management conference statement by no later than June 3, 2011 advising the Court as to their progress in finalizing the consent decree and the need for a Case Management Conference.

DATED: April 29, 2011

MEYERS, NAVE, RIBACK, SILVER & WILSON

By: /s/ Sabrina S. Wolfson
Sabrina S. Wolfson
Attorneys for Defendant, City of San Bruno

ENVIRONMENTAL ADVOCATES

DATED: April 29, 2011

By: /s/ Christopher A. Sproul
Christopher A. Sproul
Attorneys for Plaintiff, Baykeeper, Inc., d/b/a San Francisco Baykeeper

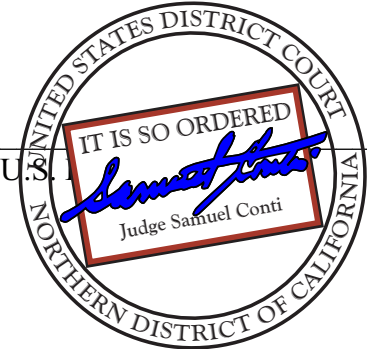
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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 4/28/11

By: _____



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CITY OF SAN BRUNO

7
8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

10
11 BAYKEEPER, INC., d/b/a SAN
12 FRANCISCO BAYKEEPER, a California
non-profit corporation,

13 Plaintiff,

14 v.

15 THE CITY OF SAN BRUNO, a municipal
16 corporation,

17 Defendant.

CASE NO.: CV 10-00753 SC

**DECLARATION OF SABRINA S.
WOLFSON ATTESTING
CONCURRENCE OF PLAINTIFF TO
STIPULATION AND [PROPOSED]
ORDER**

18 I, Sabrina S. Wolfson, declare as follows:

19 1. I am an attorney at law duly licensed to practice before the Courts of the State of
20 California and registered with the United States District Court, Northern District for e-filing, and
21 an Associate at Meyers, Nave, Riback, Silver & Wilson, attorneys of record for Defendant City of
22 San Bruno ("City"). If called to testify, I could competently testify as to the facts within this
23 Declaration, based on my personal knowledge.

24 2. The parties wish to file the Stipulation and [Proposed] Order Continuing the April
25 29, 2011 Case Management Conference today, April 28, 2011.

26 3. On April 28, 2011, Christopher Sproul, Counsel for Plaintiff, Baykeeper, Inc., d/b/a
27 San Francisco Baykeeper ("Baykeeper") indicated to me by telephone that we have permission to
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1 file the Stipulation and [Proposed] Order on Baykeeper's collective behalf.

2 4. He also indicated to me that Baykeeper concurred with the contents of the
3 Stipulation and [Proposed] Order as filed herewith.

4 I declare under penalty of perjury under the laws of the United States that the foregoing is
5 true and accurate. Executed on April 28, 2011, at Oakland, California.

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7 /s/ Sabrina S. Wolfson
8 Sabrina S. Wolfson
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