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12 Attorneys for Defendant
 CITY OF OAKLAND

14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**

16 DONNA WHITE,
 17 Plaintiff,

Case No. C11-3846 NC

Civil Rights

18 v.

STIPULATION AND ~~[PROPOSED]~~
ORDER REQUESTING CASE
MANAGEMENT CONFERENCE

19 CITY OF OAKLAND,
 20 Defendant.

_____ /

22 IT IS HEREBY STIPULATED BETWEEN THE PARTIES, BY AND THROUGH THEIR
 23 RESPECTIVE ATTORNEYS OF RECORD, AS FOLLOWS:

24 Whereas,

- 25 1. The hearing for plaintiff’s motion for summary judgment is scheduled for April 2,
- 26 2014;
- 27 2. The pretrial conference statement is due April 11, the pretrial conference is set for
- 28 April 23, and trial is scheduled for May 12, 2014;

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- 3. The parties have re-opened settlement negotiations and Howard Herman, ADR Director, has agreed to facilitate them;
- 4. The parties believe that they are close to settlement;
- 5. The expenditure of time and resources to prepare for trial would inhibit, rather than encourage, settlement;

Therefore, the parties stipulate and request:

- 1. The Court schedule a Case Management Conference to discuss extending the litigation schedule, providing time for the parties to negotiate and allowing them to receive and digest the Court's ruling on Plaintiff's motion for summary judgment before trial.
- 2. The Court schedule the CMC concurrently with the hearing on Plaintiff's Motion for Partial Summary Judgment at 1:00 p.m. on Wednesday, April 2, 2014.

Respectfully submitted,

Dated: March 18, 2014

LAW OFFICES OF PAUL L. REIN

/s/Celia McGuinness
By CELIA MCGUINNESS
Attorneys for Plaintiff
DONNA WHITE

Dated: March 18, 2014

OFFICE OF THE CITY ATTORNEY
OF OAKLAND

/s/ Arlene M. Rosen
By ARLENE M. ROSEN
Attorneys for Defendant
CITY OF OAKLAND

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ORDER

GOOD CAUSE BEING SHOWN, a further case management conference will be set at 1:00 p.m. on Wednesday, April 2, 2014.

Dated: March 18, 2014

