

1 JIVAKA CANDAPPA (SBN 225919)
 2 180 Grand Avenue, Suite 700
 3 Oakland, CA 94612
 4 Telephone: (510) 628-0300
 5 Facsimile: (510) 628-0400
 6 Email: jcandappa@att.net

7 Attorney for Plaintiff LAWRENCE HICKMAN

8 Zach Cowan, City Attorney, SBN 96372
 9 Matthew J. Orebic, Deputy City Attorney, SBN 124491
 10 BERKELEY CITY ATTORNEY'S OFFICE
 11 2180 Milvia Street, Fourth Floor
 12 Berkeley, CA 94704
 13 Telephone: (510) 981-6998
 14 Facsimile: (510) 981-6960
 15 Email: morebic@ci.berkeley.ca.us

16 Attorneys for Defendants
 17 DOUGLAS HAMBLETON, ELIZABETH BASHAN, SCOTT CASTLE and MELANIE
 18 TURNER

19 UNITED STATES DISTRICT COURT
 20 FOR THE NORTHERN DISTRICT OF CALIFORNIA

LAWRENCE HICKMAN,)	Case No.: C 11-04395 EDL
Plaintiff,)	
vs.)	
DOUGLAS HAMBLETON, <i>et al.</i> ,)	STIPULATION AND [PROPOSED] ORDER
Defendants.)	TO EXTEND ENE DEADLINE TO
)	OCTOBER 19, 2012
)	
)	
)	
)	
)	
)	
)	

21
22
23
24
25
26
27
28 STIPULATION AND [PROPOSED] ORDER RE ENE

1 Plaintiff Lawrence Hickman and Defendants Douglas Hambleton, Elizabeth Bashan,
2 Scott Castle and Melanie Turner, by and through their respective counsel, hereby stipulate as
3 follows:

4 1. Whereas the Court had originally ordered the ENE be completed by April 30,
5 2012, but the parties had not yet completed key discovery at that time;

6 2. Whereas completion of key discovery has enabled the parties to better evaluate
7 their respective position for purposes of settlement;

8 3. Whereas the ADR office did not contact counsel to schedule the ENE;

9 4. Whereas counsel did not move the Court for an extension of the ENE deadline so
10 as to complete key discovery;

11 5. Whereas this stipulation between the parties will not affect other deadlines in this
12 case.

13 6. The Parties hereby respectfully seek leave of the Court to extend the deadline for
14 conducting the ENE through and until October 19, 2012.

15 **IT IS SO STIPULATED.**

16
17 DATED: August 10, 2012

LAW OFFICE OF JIVAKA CANDAPPA
/s/ Jivaka Candappa
By: _____
JIVAKA CANDAPPA, Attorney for Plaintiff
LAWRENCE HICKMAN

18
19
20
21 DATED: August 10, 2012

ZACH COWAN, City Attorney
By: /s/ Matthew J. Orebic
MATTHEW J. OREBIC
Attorneys for Defendants
DOUGLAS HAMBLETON, ELIZABETH
BASHAN, SCOTT CASTLE and MELANIE
TURNER


22
23
24
25
26
27
28 STIPULATION AND [PROPOSED] ORDER RE ENE

ORDER

Pursuant to stipulation, the deadline to conduct the ENE is extended through and until October 19, 2012.

IT IS SO ORDERED.

Dated: August 13, 2012


HON. ELIZABETH D. LAPORTE
United States Magistrate 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

STIPULATION AND [PROPOSED] ORDER RE ENE

Lawrence Hickman vs. City of Berkeley et al.
Case No. C 11-04395 EDL