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8 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
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10 KATHLEEN STALLWORTH,

Case No. C 11-04841 JSW

11 Plaintiff,

APPLICATION AND PROPOSED ORDER TO
REVISE BRIEFING SCHEDULE
AND CONTINUING HEARING

12 vs.

13 ANDREA BROLLINI, MICHELLE DE LA
14 CALLE, COUNTY OF SANTA CLARA,
SANTA CLARA PERSONNEL BOARD,
15 Does 1 through 10,

16 Defendants.
17 _____/

18 Plaintiff applies to the court for an order altering the current briefing schedule for the
19 hearing on the Administrative Mandamus claim now calendared for hearing on 19 July 2013.
20 Good cause exists for this application for the reason that 1) the record is voluminous and
21 citations extensive. The time available to plaintiff to prepare the opening brief is proving to be
22 insufficient. 2) Plaintiff's counsel is set for jury duty during the week of 22 April 2013. The
23 current order requires the both the administrative record and plaintiff's brief to be filed on or
24 before 1 May 2013.

25 The record consists of a hearing transcript of 1044 pages generated over a four day
26 period, multi-page exhibits offered by the County of Santa Clara that exceed 100 in number,
27 plaintiff's multi-page exhibits A through J, and sundry other documents. The hearing involved
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1 20 discrete charges of misconduct each of which will analyzed factually and involve multiple
2 record citations. The Court's existing schedule for filing of the administrative record the same
3 day as plaintiff's brief prejudices plaintiff's ability to timely prepare and file her opening brief.

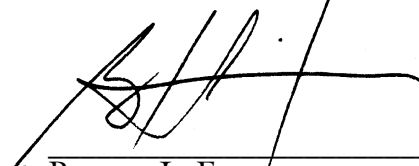
4 Currently the briefing schedule is as follows: Plaintiff's opening brief, due 1 May 2013;
5 Defendants' responding brief, due 15 June 2013; Plaintiff's reply brief, due 1 July 2013.

6 Plaintiff requests the following: Administrative record to be filed on or before 1 May
7 2013; Plaintiff to file her opening brief on or before 1 June 2013; Defendants' responding
8 brief be due on or before 15 July and plaintiffs reply be due 1 August. As a result of this
9 change to the briefing schedule, the hearing current date will necessarily have to be rescheduled
10 from its current date of 19 July 2013 to a time convenient for the Court. With this briefing
11 schedule, each side will then have 45 days to prepare the opening and responding briefs with
12 15 days to file a reply. The defendants have no objection to this change in briefing schedule.

13 Respectfully submitted.

14 DATED: 11 April 2013

LAW OFFICES OF BLAINE L. FIELDS

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18 BLAINE L. FIELDS
Attorney for Plaintiff Kathleen Stallworth

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20 ORDER AMENDING THE ADMINISTRATIVE
21 MANDAMUS BRIEFING SCHEDULE

22 The Court, having considered the plaintiff's application and finding good cause, hereby
23 amends the briefing schedule as follows: Plaintiff's opening brief shall be due 1 June 2013;
24 defendants' responding brief shall be due 15 July 2013; plaintiff's reply brief shall be due 1
25 August 2013. Hearing on the mandamus claim shall be scheduled for August 23, 2013 at 9:00 a.m.

26 Dated: April 12, 2013

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28 JUDGE JEFFREY S. WHITE
United States District Court