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9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION

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|------------------------------|---|--------------------------|
| 13 GREGORY HAYNES, |) | CASE NO. 11-5021 JST |
| |) | |
| 14 Plaintiff, |) | STIPULATION AND PROPOSED |
| |) | ORDER |
| 15 v. |) | |
| |) | |
| 16 CHRISTIAN HANSON, et al., |) | |
| |) | |
| 17 Defendants. |) | |
| |) | |

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 21 THE UNDERSIGNED PARTIES STIPULATE AS FOLLOWS:

- 22 1. On August 20, 2014, Defendants Christian Hanson and Moshe Oberstein filed their motion
 23 for summary judgment, which has a scheduled hearing date of October 2, 2014. ECF Nos.
 24 116-120.
- 25 2. On August 27, 2014, Plaintiff Haynes requested an agreement from Defendants' counsel to
 26 extend the time for the filing of Plaintiff's opposition from September 3, 2014 to September
 27 24, 2014.

- 1 3. On August 28, 2014, Defendants' counsel confirmed that the requested 21 day extension
2 was unacceptable because it would delay the hearing on the Defendants' motion and
3 potentially endanger the pending December 1, 2014 trial date, as well as create additional
4 burdens on the parties and the Court with respect to the preparation of pretrial papers in
5 advance of the scheduled pretrial conference on November 14, 2014.
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7 4. In light of the foregoing, Defendants informed Plaintiff that a 7 day extension on the
8 deadline for the filing of Plaintiff's opposition, namely from September 3, 2014 to
9 September 10, 2014, would be acceptable to Defendants but only if the Court found it
10 acceptable, the summary judgment hearing date remained intact and the other pretrial
11 deadlines and trial date did not change.
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13 5. Therefore, the parties respectfully request that the Court permit the following to the
14 deadlines applicable to the motion for summary judgment.

15 Last day for Plaintiff to file any opposition to the motion: September 10, 2014

16 Last day for Defendants to file any reply to Plaintiff's opposition: September 17, 2014

17 Hearing date and location: October 2, 2014, at 2:00 p.m. in Courtroom 9, 19th Floor, 450
18 Golden Gate Avenue, San Francisco, CA 94102.

19 All other case management dates remain unchanged.
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22 **IT IS SO STIPULATED.**

23
24 DATED: August 28, 2014

/s/
Plaintiff Gregory M. Haynes

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26 DATED: August 28, 2014

/s/
Assistant U.S. Attorney Jonathan U. Lee
Attorneys for Defendants Hanson and
Oberstein

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(PROPOSED) ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Last day for Plaintiff to file any opposition to the motion: September 10, 2014

Last day for Defendants to file any reply to Plaintiff's opposition: September 17, 2014

Hearing date: October 2, 2014, at 2:00 p.m. in Courtroom 9, 19th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102.

All other case management dates remain unchanged.

DATED: September 2, 2014

Hon. JON S. TIGAR
United States District Court

