

1 Angela L. Morgan, State Bar No. 208585
 2 LOGAN LAW GROUP
 2410 Camino Ramon, Suite 274
 San Ramon, California 94583
 Telephone: (925) 277-9794
 Facsimile: (925) 558-0012

5 UNITED STATES DISTRICT COURT
 6 NORTHERN DISTRICT OF CALIFORNIA

7 WALTER JEFFERSON,

8 Plaintiff,

9 v.

10 THE CITY OF FREMONT, FREMONT
 11 TENNIS CENTER, JEFF GONCE, JOE
 GRECH, ANNABELLE HOLALND, KELLY
 12 KING and Does 1 through 10, inclusive,

13 Defendants.

Case No. 3:12-cv-00926 EMC

**STIPULATION OF COUNSEL AND PROPOSED
 ORDER TO RESCHEDULE THE DEADLINE TO
 COMPLETE EARLY NEUTRAL EVALUATION,
 FILE THIRD AMENDED COMPLAINT AND
 CONTINUE CASE MANAGEMENT
 CONFERENCE ; ORDER**

Honorable Edward M. Chen

15 Plaintiff Walter Jefferson and Defendants City of Fremont, a municipal public entity on behalf of
 16 itself and the Fremont Tennis Center, Jeff Gonce, Joe Grech, Annabelle Holland, and Kelly King hereby
 17 submit the following Stipulation and Proposed Order rescheduling the deadline to complete Early Neutral
 18 Evaluation and to file Third Amended Complaint.

19 The Court ordered Early Neutral Evaluation to be completed by February 13, 2013. However,
 20 new information pertinent to the prosecution of this action has been brought to the attention of Plaintiff.
 21 As such, Plaintiff requires sufficient time to investigate the new claims in order to have a productive
 22 early neutral evaluation. In an effort to not delay this case any further, Plaintiff will file his Third
 23 Amended Complaint.

24 IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

- 25 1. The deadline to complete Early Neutral Evaluation shall be rescheduled to April 29, 2013.
- 26 2. Plaintiff will file his Third Amended Complaint no later than February 8, 2013.
- 27 3. Defendants shall have until March 1, 2013 to file a responsive pleading to the Third
 28 Amended Complaint.

1
2 **[PROPOSED] ORDER**

3 Pursuant to the above Stipulation of the parties by and through their respective counsel of record,
4 it is hereby ORDERED as follows:

- 5 1. Early Neutral Evaluation shall be completed by April 29, 2013.
6 2. Plaintiff shall file his Third Amended Complaint no later than February 8, 2013.
7 3. Defendants shall have until March 1, 2013 to file a responsive pleading to the Third
8 Amended Complaint.
9 4. The Case Management Conference shall be reset from February 28, 2013 at 9:00a.m. to
10 April 18, 2013 at 9:00a.m

11 **IT IS SO ORDERED.**

12 Dated: January ¹⁷ __, 2013

