.-

	Case3:12-cv-00926-EMC Docume	ent82	Filed03/25/14	Page1 of 4	
1 2 3 4 5 6 7 8 9	Gregory M. Fox, State Bar No. 070876 Ilana Kohn, State Bar No. 203389 (Of Counsel) BERTRAND, FOX & ELLIOT The Waterfront Building 2749 Hyde Street San Francisco, California 94109 Telephone: (415) 353-0999 Facsimile: (415) 353-0990 Harvey E. Levine, Esq., State Bar No. 61880 City Attorney City of Fremont 3300 Capitol Avenue PO Box 5006 Fremont, CA 94537-5006 Telephone: (510) 284-4030 Facsimile: (610) 284-4031			E-Filing 3/26.10+	
10 11	Attorneys for Defendants CITY OF FREMONT, FREMONT TENNIS CENTER, JEFF GONCE, JOE GRECH, ANNABELLE HOLLAND and KELLY KING				
12 13 14 15	Angela L. Morgan, State Bar No. 208585 MORGAN-LOGAN LAW GROUP 2603 Camino Ramon, Suite 200 San Ramon, CA 94583 Telephone: (925) 277-9794 Facsimile: (925) 558-0012				
16 17	Attorneys for Plaintiff WALTER JEFFERSON				
18	UNITED STATES DISTRICT COURT				
19	NORTHERN DISTRICT OF CALIFORNIA				
20	WALTER JEFFERSON,	Case No. 3:12-cv-00926 EMC			
21	Plaintiff,	STIPULATION OF COUNSEL AND [PROPOSED] ORDER TO EXTEND DEADLINE FOR DISPOSITIVE MOTIONS AND NON-			
22	v.				
23 24	THE CITY OF FREMONT, FREMONT TENNIS CENTER, JEFF GONCE, and Does 1 through 10, inclusive,	EXPERT DISCOVERY CUT-OFF			
25	Defendants.	Hon.	Edward M. Ch	en	
26					
27				Ļ	
28					
	STIPULATION OF COUNSEL AND [PROPOSED		R TO EXTEND I	DEADLINE FOR DISPOSITIVE	
	MOTIONS AND NON-EX	VPERT I	DISCOVERY CU	T-OFF	

Case3:12-cv-00926-EMC Document82 Filed03/25/14 Page2 of 4

Defendants City of Fremont, a municipal public entity on behalf of itself and the Fremont Tennis Center and Jeff Gonce, and Plaintiff Walter Jefferson hereby submit the following Stipulation and Proposed Order extending the time for dispositive motions and non-expert discovery cut-off.

WHEREAS on July 12, 2013, the Court issued a Case Management and Pre-Trial Order for Jury Trial ("Order"). Pursuant to the Order, the parties were to complete non-expert discovery by March 20, 2014, and the last day for dispositive motions to be heard was June 12, 2014.

WHEREAS on February 20, 2014, at the Joint Status Conference, the parties notified the Court that plaintiff intended to take the deposition of Jeff Gonce and that Mr. Gonce's deposition could not be completed before the March 20, 2014 discovery cut-off deadline;

WHEREAS the parties have met and conferred and agreed that plaintiff will take the deposition
of Jeff Gonce in Reno on May 28, 2014. The defendants also anticipate taking the depositions of Paul
Concepcion and Sarah Robinson before May 28, 2014;

WHEREAS the parties have agreed that the last day for dispositive motions to be heard should be
moved to July 31, 2014, in order to complete the above depositions and allow sufficient time to brief said
motions.

IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

The time to complete non-expert discovery shall be extended to May 30, 2014. The last day for
dispositive motions to be heard shall be extended to July 31, 2014 at 1:30 p.m.

SO STIPULATED.

Dated: March 20, 2014

1

2

3

4

5

6

7

8

9

16

19

20

21

22

23

24

25

26

27

28

BERTRAND, FOX & ELLIOT

By: /s/ Ilana Kohn Gregory M. Fox Ilana Kohn (Of Counsel) Attorneys for Defendants CITY OF FREMONT, FREMONT TENNIS CENTER, JEFF GONCE, JOE GRECH, ANNABELLE HOLLAND and KELLY KING

2

STIPULATION OF COUNSEL AND [PROPOSED] ORDER TO EXTEND DEADLINE FOR DISPOSITIVE MOTIONS AND NON-EXPERT DISCOVERY CUT-OFF Case3:12-cv-00926-EMC Document82 Filed03/25/14 Page3 of 4

Dated: March 25, 2014 MORGAN LOGAN LAW GROUP By: /s/ Angela L. Morgan Attorney for Plaintiff WALTER JEFFERSON STIPULATION OF COUNSEL AND [PROPOSED] ORDER TO EXTEND DEADLINE FOR DISPOSITIVE MOTIONS AND NON-EXPERT DISCOVERY CUT-OFF

CERTIFICATE OF CONCURRENCE

I, Ilana Kohn, declare:

1

2

3

4

_

Pursuant to Local Rule No. 5-1(i)(3) I have obtained the concurrence of all other parties in the filing of this document, which shall serve in lieu of their signatures on the documents.

5	I declare under penalty of perjury under the laws of the State of California that the foregoing is		
6	true and correct and that this declaration is executed at San Francisco, California, on March 20, 2014.		
7			
8	/s/ ILANA KOHN, Esq.		
9			
10			
11			
12	ORDER		
13	Pursuant to the above Stipulation of the parties by and through their respective counsel of record,		
14	it is hereby ORDERED as follows:		
15	1. The time to complete non-expert discovery shall be extended to May 30, 2014.		
16	2. The last day for dispositive motions to be heard shall be extended to July $\frac{10}{31}$, 2014 at 1:30		
17	p.m.		
18			
19	IT IS SO ORDERED.		
20			
21	Dated: March 7 , 2014 EDWARD M. CHEN		
22	UNITED STATES DISTRICT COURT JUDGE		
23			
24			
25			
26			
27			
28			
	4 STIPULATION OF COUNSEL AND [PROPOSED] ORDER TO EXTEND DEADLINE FOR DISPOSITIVE		
	MOTIONS AND NON-EXPERT DISCOVERY CUT-OFF		
I	1 I I I I I I I I I I I I I I I I I I I		