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 15 CONTRA COSTA COUNTY

16 **UNITED STATES DISTRICT COURT**

17 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

19 RETIREE SUPPORT GROUP OF
 20 CONTRA COSTA COUNTY,
 21 Plaintiff,
 22 v.
 23 CONTRA COSTA COUNTY,
 24 Defendant.
 25

No. C12-00944 (JSW)

**JOINT STIPULATION TO EXTEND CASE
 MANAGEMENT CONFERENCE AND
 [PROPOSED] ORDER
 (N.D. Local Rule 6-1(a))**

1 WHEREAS, pursuant to the Court's Order of March 7, 2012, Defendant Contra Costa
2 County ("County" or "Defendant") and Plaintiff Retiree Support Group of Contra Costa County
3 ("Plaintiff") (together, "the Parties") are calendared to appear for an Initial Case Management
4 Conference ("CMC") on June 15, 2012 (Dkt. 8);

5 WHEREAS, Defendant filed a Motion to Dismiss the Amended Complaint (the "Motion to
6 Dismiss") on April 30, 2012 (Dkt. 15);

7 WHEREAS, the Parties filed a joint stipulation requesting a modification of the briefing
8 schedule for the Motion to Dismiss (Dkt 20);

9 WHEREAS, this Court found good cause to grant the Parties' Amended Stipulation to
10 Extend Briefing Schedule based on the declarations of Jeffrey Lewis and Raymond F. Lynch, lead
11 counsel in this matter, and on May 8, 2012, ordered a modified briefing schedule that extended the
12 deadline for the filing of Plaintiff's Opposition to May 23, 2012 and for Defendant's Reply brief to
13 June 6, 2012 (Dkt. 22);

14 WHEREAS, on May 10, 2012, the Court *sua sponte* changed the hearing date for the
15 Motion to Dismiss to July 13, 2012 (Dkt. 23);

16 WHEREAS, pursuant to the Court Order of March 7, 2012, the Parties must hold their
17 meet and confer session regarding initial disclosures, early settlement, alternate dispute resolution
18 process selection and the creation of a discover plan by May 25, 2012 (Dkt. 8);

19 WHEREAS, on June 8, 2012, the Parties must make their initial disclosures and file a Case
20 Management Report with the Court (Dkt. 8);

21 WHEREAS, the CMC presently is scheduled on June 15, 2012, four (4) weeks before the
22 hearing on the Motion to Dismiss the Complaint (Dkt 8);

23 WHEREAS, Jeffrey Lewis, lead counsel for Plaintiff, must prepare for and take multiple
24 depositions in locations across the country in a complex financial case, and must also prepare for
25 oral argument before the Ninth Circuit;

26 WHEREAS, Andrew Lah, the associate attorney who will be doing much of the work in
27 preparing for the CMC, is engaged in complex negotiations, which are time sensitive;

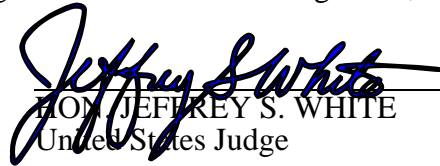
28 WHEREAS, Raymond F. Lynch, lead counsel for Defendant, is involved in a writ of

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ORDER

PURSUANT TO THE FOREGOING STIPULATION, ~~IT IS SO ORDERED.~~
the Court HEREBY CONTINUES the case management conference to August 10, 2012 at 1:30 p.m.

Dated: May 21, 2012



JOY JEFFREY S. WHITE
United States Judge