

1 JOHN L. BURRIS, Esq./ State Bar #69888
 2 BENJAMIN NISENBAUM, Esq./State Bar #222173
 3 LAW OFFICES OF JOHN L. BURRIS
 4 Airport Corporate Centre
 5 7677 Oakport Street, Suite 1120
 6 Oakland, California 94621
 7 Telephone: (510) 839-5200
 8 Facsimile: (510) 839-3882

9 Attorneys for Plaintiff
 10 KEITH BRYANT

11 UNITED STATES DISTRICT COURT
 12 FOR THE NORTHERN DISTRICT OF CALIFORNIA

13 KEITH BRYANT,

Case No. C 12-02102 EMC

14 Plaintiff,

**STIPULATION AND [PROPOSED] ORDER
 CONTINUING STATUS CONFERENCE
 AND EXTENDING DEADLINE TO
 COMPLETE ADR**

15 vs.

16 OAKLAND HOUSING AUTHORITY, a
 17 municipal corporation; CAREL J. DUPLESSIS,
 18 in his capacity as Chief of Police for the
 19 OAKLAND HOUSING AUTHORITY; Officer
 20 CZECHOWSKI, individually and in his capacity
 21 as a police officer for the OAKLAND
 22 HOUSING AUTHORITY; Officer Z.
 23 HOMAYUN, individually and in her capacity as
 24 a police officer for the OAKLAND HOUSING
 25 AUTHORITY; Officer VARGAS, individually
 26 and in his capacity as a police officer for the
 27 OAKLAND HOUSING AUTHORITY; DOES
 28 1-25, inclusive,

Defendants.

STIPULATION

1. WHEREAS, the Court ordered the parties to complete ADR before the upcoming Further Case Management Conference on February 7, 2013;

1 2. WHEREAS, the parties require conducting some discovery prior to meaningfully
2 participating in mediation;

3 3. WHEREAS, the parties have been in contact with the Court's ADR-assigned
4 mediator, David Alexander regarding scheduling the mediation;

5 4. WHEREAS, Plaintiff's deposition is currently set for February 21, 2013;

6 5. WHEREAS, the parties do not expect any meaningful ADR can take place prior to
7 Plaintiff's deposition being taken;

8 6. The parties respectfully request that the Court continue the upcoming Status
9 Conference by four weeks to March 7, 2013 at 10:30 a.m. to allow the parties to complete ADR by
10 the time of the Status Conference;

11 7. The parties also respectfully request that ADR deadline for completion be extended to
12 March 6, 2013.

13
14 **IT IS SO STIPULATED.**

15
16
17 Dated: January 25, 2013

LAW OFFICES OF JOHN L. BURRIS

18
19 /s/ Benjamin Nisenbaum

20 Benjamin Nisenbaum, Esq.
21 Attorney for Plaintiff
22 Keith Bryant

23
24 Dated: January 25, 2013

CHOLAKIAN & ASSOCIATES

25 /s/ Brian Finn

26 Brian Finn, Esq.
27 Attorney for Defendants
28

1
2 **[PROPOSED] ORDER**

3 PURSUANT TO THE PARTIES' STIPULATION, the parties deadline for completion of
4 mediation through the Court's ADR program is extended to by March 6, 2013. The Status
5 Conference is hereby continued to March 21, 2013 at 10:30 a.m. A Joint Status Update
6 shall be filed by the parties no later than ~~February 28, 2013.~~ March 14, 2013.

8
9 **IT IS SO ORDERED.**

10 DATED: 1/30/13

