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8	UNITED STATES DISTRICT COURT	
9	NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION	
10		
11	OXANE "GYPSY" TAUB and GEORGE	) Case № 3:12-cv-05841-EMC (NJV)
12	DAVIS, Plaintiffs,	) ) STIPULATED REQUEST TO STAY
13	V.	PROCEEDINGS AND TO DISMISS
14	CITY AND COUNTY of SAN	) PLAINTIFF RUSSELL MILLS FROM ) THIS ACTION
15	FRANCISCO, and SAN FRANCISCO POLICE DEPARTMENT,	
16	Defendants.	)
17		
18	WHEREAS the Parties attended a settlement conference on March 12, 2014, during	
19	which they discussed a proposal that may allow the Parties to settle this action;	
20	<b>WHEREAS</b> the Parties need additional time to consider that settlement proposal;	
21		
22	WHEREAS, Magistrate Judge Vadas has agreed to continue to preside over any	
23	future settlement negotiations between the Parties;	
24	WHEREAS Plaintiffs' motion for leave to file an amended complaint is currently due	
25	on March 31, 2014, with a hearing scheduled for May 8, 2014;	
26		
27	whekeas, a Case Management Co	onference is currently scheduled for May 8, 2014;

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WHEREAS, Defendants agrees that Russell Mills has complied with his discovery obligations, and therefore may be dismissed from this action according to the Court's Order dated July 18, 2013;

The Parties do thereby **STIPULATE and AGREE** to stay all aspects of the proceedings for 60 days, and to dismiss Russell Mills from this action. The Parties hereby request that the Court enter the following Order.

IT IS SO STIPULATED AND AGREED.

Dated: <u>March 13, 2014</u>

<u>/s/ D. Gill Sperlein</u> D. GILL SPERLEIN THE LAW OFFICE OF D. GILL SPERLEIN Attorney for Plaintiffs Oxane Taub and George Davis

Dated: March 13, 2014

DENNIS J. HERRERA City Attorney

> By: <u>/s/ Tara M. Steeley</u> TARA M. STEELEY

Attorneys for Defendants CITY AND COUNTY OF SAN FRANCISCO, SAN FRANCISCO POLICE DEPARTMENT 

## [PROPOSED] ORDER

The proceedings are hereby stayed for 60 days, during which time Magistrate Judge Vadas shall preside over any continued settlement negotiations.

Discovery is stayed for 60 days. Plaintiffs' deadline for filing a motion for leave to file a second amended complaint shall be extended to June 18, 2014, with that motion set for hearing on July 24, 2014 at 1:30 pm. The Case Management Conference is hereby continued to July 24, 2014 at 1:30 pm.

Russell Mills is hereby dismissed as a Plaintiff in this action.

