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 7 COUNTY OF ALAMEDA, GREGORY  
 AHERN, BRETT KETELES, CARLA  
 8 KENNEDY, DAVID BRADY, GREGORY  
 MORGADO and KERRY JACKSON  
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10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA  
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| 13 STEVEN ANGELL, MILES AVERY, MOLLY )           | Case No.: C13-0190 NC                      |
| BATCHELDER, SRI LOUISE also known as )           |  |
| 14 Louise Coles, CICILY COOPER, SHAREEF )        | <b>STIPULATION TO CONTINUE</b>             |
| ELFIKI, THEODORE HEXTON, LINDSAY )               | <b>PLAINTIFFS' DEADLINE FOR FILING</b>     |
| 15 WEBER, Individually and on behalf of others ) | <b>MOTION FOR CLASS CERTIFICATION</b>      |
| similarly situated, )                            | <b>AND CASE MANAGEMENT</b>                 |
| 16 )   | <b>CONFERENCE AND ALL RELATED</b>          |
| Plaintiffs, )                                    | <b>DATES AND <del>PROPOSED</del> ORDER</b> |
| 17 )   |  |
| vs. )  |  |
| 18 )   |  |
| CITY OF OAKLAND, COUNTY OF )                     | Complaint Filed: January 14, 2013          |
| 19 ALAMEDA, HOWARD JORDAN, JEFFREY )             |  |
| ISRAEL, ERIC BRESHEARS, RON YELDER, )            |  |
| 20 DARREN ALLISON, STEVE TULL, )                 |  |
| EDWARD TRACEY, ANTHONY RACHAL, )                 |  |
| 21 SEAN WHENT, GREGORY J. AHERN, )               |  |
| BRETT KETELES, CARLA KENNEDY, )                  |  |
| 22 DAVID BRADY, GREGORY L. MORGADO, )            |  |
| KERRY JACKSON, DOES 1-250, )                     |  |
| 23 )   |  |
| Defendants. )                                    |  |
| 24 )   |  |

25 The parties herein hereby stipulate and jointly apply to the Court for relief from existing  
 26 deadlines in the above-referenced matter as follows:

28 **STIPULATION TO CONTINUE PLAINTIFFS' DEADLINE FOR FILING MOTION FOR CLASS  
 CERTIFICATION AND CASE MANAGEMENT CONFERENCE AND ALL RELATED DATES AND  
~~PROPOSED~~ ORDER**

1 The parties have participated in settlement conferences with Magistrate Judge Laurel  
2 Beeler on January 13, February 24 and April 8, 2014. The parties and Judge Beeler feel that good  
3 progress has been made toward reaching a resolution of the plaintiffs' claims, and that a further  
4 settlement conference would be beneficial. Judge Beeler and the parties have agreed to have a  
5 fourth settlement conference on June 27, 2014 at 10:30 a.m. The parties and Judge Beeler also feel  
6 that the interests of justice will be served, and the potential for a resolution of this matter will be  
7 improved, if the current deadline for the plaintiffs to file a motion for class certification is  
8 continued to permit the settlement process to continue.

9 As a consequence, the parties jointly request that the Court continue the present deadlines  
10 for completion of the settlement conference with Judge Beeler, for filing the motion for class  
11 certification and the joint case management conference statement and the date of the case  
12 management conference as follows:

13 Completion of settlement conference with Judge Laurel Beeler: July 31, 2014

14 Last date for plaintiffs to file motion for class certification: August 6, 2014

15 Filing of joint case management conference statement: September 17, 2014

16 Case management conference: September 24, 2014 at 10:00 a.m.

17 DATED: April 28, 2014

18 YOLANDA HUANG, ESQ.

19  
20 By: /s/ Yolanda Huang

21 YOLANDA HUANG, ESQ.  
22 Attorneys for Plaintiffs

23 DATED: April 2, 2014

24 SIEGEL & YEE

25 By: /s/ Dan Siegel

26 DAN SIEGEL, ESQ.  
27 Attorneys for Plaintiffs

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**STIPULATION TO CONTINUE PLAINTIFFS' DEADLINE FOR FILING MOTION FOR CLASS  
CERTIFICATION AND CASE MANAGEMENT CONFERENCE AND ALL RELATED DATES AND  
~~PROPOSED~~ ORDER**

Steven Angell, et al. vs. City of Oakland, et al.; USDC-Nor Dist. Case No. C13-0190 NC

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DATED: April 28, 2014

BARBARA J. PARKER, City Attorney  
JAMES F. HODGKINS, Supervising Trial  
Attorney

By:  /s/ James F. Hodgkins  
JAMES F. HODGKINS, ESQ.  
Attorneys for Defendants  
CITY OF OAKLAND, et al

DATED: April 28, 2014

BOORNAZIAN, JENSEN & GARTHE  
A Professional Corporation

By:  /s/ Gregory J. Rockwell  
GREGORY J. ROCKWELL, ESQ.  
Attorneys for Defendants  
COUNTY OF ALAMEDA, et al.

**STIPULATION TO CONTINUE PLAINTIFFS' DEADLINE FOR FILING MOTION FOR CLASS  
CERTIFICATION AND CASE MANAGEMENT CONFERENCE AND ALL RELATED DATES AND  
[PROPOSED] ORDER**

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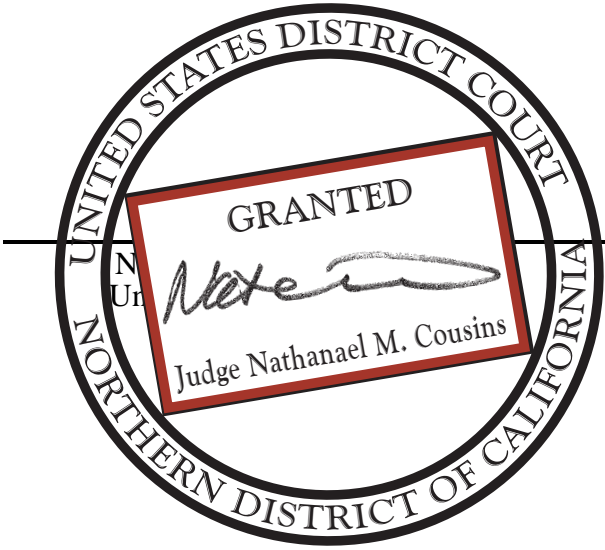
**ORDER**

GOOD CAUSE appearing therefor, and the parties having so stipulated, the Court hereby GRANTS the parties' joint application for continuance of all existing deadlines and hearing and filing dates as follows:

- Completion of settlement conference with Judge Laurel Beeler: July 31, 2014
- Last date for plaintiffs to file motion for class certification: August 6, 2014
- Filing of joint case management conference statement: September 17, 2014
- Case management conference: September 24, 2014 at 10:00 a.m.

IT IS SO ORDERED

Dated: April 28, 2014



1 **PROOF OF SERVICE BY ELECTRONIC SERVICE**

2  
3 I, the undersigned, declare as follows:

4 I am employed in the County of Alameda, State of California. I am over the age of 18  
5 years and not a party to the within action. My business address is 555 12th Street, Suite 1800,  
6 P. O. Box 12925, Oakland, California 94604-2925.

7 On the date indicated below, at the above-referenced business location, I served the  
8 **STIPULATION TO CONTINUE PLAINTIFFS' DEADLINE FOR FILING MOTION FOR**  
9 **CLASS CERTIFICATION AND CASE MANAGEMENT CONFERENCE AND ALL**  
10 **RELATED DATES AND [PROPOSED] ORDER** on the below-named party and caused said  
11 document to be transmitted using ECF as specified by General Order No. 45 to the following  
12 party:

|  |  |
|--|--|
| 13 Yolanda Huang, Esq.<br>14 P.O. Box 5475<br>15 Berkeley, CA 94705<br>16 Tel: (510) 329-2140<br>17 Fax: (510) 580-9410<br><br>18 Dan Siegel, Esq.<br>19 Anne Weills, Esq.<br>20 SIEGEL & YEE<br>21 499 14 <sup>th</sup> Street, Suite 300<br>22 Oakland, CA 94612<br>23 Tel: (510) 839-1200<br>24 Fax: (510) 444-6698 | 25 <b>Attorneys for Plaintiffs STEVEN ANGELL,<br/>MILES AVERY, MOLLY BATCHELDER,<br/>SRI LOUISE also known as Louise Coles,<br/>CICILY COOPER, SHAREEF ELFIKI,<br/>THEODORE HEXTON, LINDSAY<br/>WEBER, Individually and on behalf of<br/>others similarly situated</b> |
| 26 Barbara J. Parker, Esq.<br>27 Randolph W. Hall, Esq.<br>Oakland City Attorney's Office<br>One Frank H. Ogawa Plaza, 6th Fl.<br>Oakland, CA 94612<br>Tel: (510) 238-7686<br>Fax: (510) 238-6500<br>E-mail: <a href="mailto:rhall@oaklandcityattorney.org">rhall@oaklandcityattorney.org</a>                          | <b>Attorneys for Defendants CITY OF<br/>OAKLAND, et al.</b>  |

**STIPULATION TO CONTINUE PLAINTIFFS' DEADLINE FOR FILING MOTION FOR CLASS  
CERTIFICATION AND CASE MANAGEMENT CONFERENCE AND ALL RELATED DATES AND  
[PROPOSED] ORDER**

1 Gregory A. Wedner, Esq.  
2 William E. Simmons, Esq.  
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8 E-mail: [wsimmons@lozanosmith.com](mailto:wsimmons@lozanosmith.com)

6 I declare under penalty of perjury under the laws of the United States of America that the  
7 foregoing is true and correct.

8 Executed at Oakland, California, on April 28, 2014.

9 /s/ Candace Hankins

10 Candace Hankins

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