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14 Attorneys for Defendant DARRIN BRIGHT

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA
 17

18 TIO DINERO SESSOMS,

19 Plaintiff,

20 v.

21 R.N. HELEN THORNTON; R.N. FRANCES
 SSEMEBWA; DR. EDWARD BIRDSONG;
 22 DR. KUMAR; DR. POMPAN; DR. JOHN
 DOWBAK; DR. ELIZABETH B.
 23 SCHNEIDER; DR. T.W. WY; DR. BRIGHT;
 DR. A. ADAMS; G. ELLIS; RANDY
 24 GROUNDS,

25 Defendants.

Case No. CV 13-0714 WHA (PR)

**STIPULATION AND ~~PROPOSED~~
 ORDER TO EXTEND SUMMARY
 JUDGMENT AND CASE
 MANAGEMENT DEADLINES**

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28 CASE No. cv13-00714 WHA (PR)

STIPULATION AND ~~PROPOSED~~ ORDER
 TO EXTEND SUMMARY JUDGMENT AND
 CASE MANAGEMENT DEADLINES

1 STIPULATION

2 Plaintiff Tio Dinero Sessoms and Defendant Darren Bright, by and through their
3 undersigned counsel, respectfully request that the Court enter the following stipulation pursuant
4 to Federal Rule of Civil Procedure 6(b) and Civil Local Rule 6-2 for a brief extension of (1) the
5 opposition and reply brief deadlines and hearing date for Defendant’s motion for summary
6 judgment; and (2) the case management statement deadline and case management conference.

7 In support of this stipulation, the undersigned parties provide the following facts:

8 1. On May 5, 2015, this Court issued an order setting Defendants’ deadline to file a
9 motion for summary judgment on June 4, 2015. Due to the withdrawal of Plaintiff’s former
10 pro bono counsel, the Court referred the case to the Federal Pro Bono Project and granted
11 Plaintiff a four-week extension of the deadline to respond. The order also stated that the Court
12 “would also consider a reasonable motion to extend or to continue deadlines (where good cause is
13 shown) brought by new appointed pro bono counsel.” (Dkt. 91.)

14 2. On June 1, 2015, the Court appointed Ivor Samson, Bonnie Lau and Jessica
15 Duggan, all of Dentons US LLP, as pro bono counsel for Plaintiff pursuant to 28 U.S.C.
16 1915(e)(1) and the Court’s Federal Pro Bono Project guidelines. The Court set the briefing
17 schedule on Defendants’ motion for summary judgment as follows: Defendants’ motion for
18 summary judgment due on June 4, 2015; Plaintiff’s opposition brief due on July 16, 2015; and
19 Defendants’ reply brief due on July 23, 2015. The Court scheduled the hearing on the motion for
20 summary judgment on August 13, 2015 at 8:00 a.m. (Dkt. 96.)

21 3. The Court also ordered the parties to file a joint case management statement
22 pursuant to Civil Local Rule 16-9 no later than August 6, 2015, and scheduled a case
23 management conference on August 13, 2015 at 8:00 a.m. (Dkt. 96).

24 4. Defendant Bright filed a “Supplemental Motion for Summary Judgment” on
25 June 4, 2015. (Dkt. 98.)

1 5. Good cause exists to extend the opposition and reply deadlines and hearing date
2 for Defendant Bright's Supplemental Motion for Summary Judgment, as well as the case
3 management statement deadline and case management conference. Ms. Lau has a Federal Circuit
4 appeal brief due on July 6 and a summary judgment motion due on July 8. Ms. Lau also has a
5 previously-scheduled work trip to Japan from July 13-24 for an investigation in another matter.
6 Ms. Duggan has a post-trial brief due on June 8 and closing arguments in that same trial on June
7 22. In addition, Ms. Duggan has previously-scheduled out-of-state family commitments from
8 July 2-9 and July 30-August 3. Counsel for Defendant Bright, Susan Kawala, has a prepaid
9 vacation from August 9-16, which conflicts with the current hearing date.

10 In light of the above facts, the parties jointly request that the Court briefly extend the
11 summary judgment and case management deadlines, and enter the following stipulation as an
12 Order of the Court:

- 13 A. Plaintiff shall file his opposition brief by August 17, 2015.
14 B. Defendant shall file his reply brief by August 24, 2015.
15 C. The hearing on Defendant Bright's Supplemental Motion for Summary Judgment
16 shall be on September 10, 2015 at 8:00 a.m.
17 D. The case management conference shall be on September 10, 2015 at 8:00 a.m.
18 E. The parties shall file a joint case management statement no later than September 3,
19 2015.

20 Dated: June 10, 2015

Respectfully submitted,

DENTONS US LLP

23 BY: /s/ Bonnie Lau
24 Bonnie Lau


25 Attorneys for Plaintiff
26 TIO DINERO SESSOMS
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PROPOSED ORDER

Pursuant to Stipulation and for good cause shown,
IT IS SO ORDERED.

Dated: June 15, 2015.

BY: 

Hon. William Alsup
United States District Judge