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8 Attorneys for Defendant
 9 LONGS DRUG STORES CALIFORNIA, L.L.C. and
 ARMSTRONG DEVELOPMENT PROPERTIES,
 10 INC.

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA

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 14 LONGS DRUG STORES CALIFORNIA,
 L.L.C., a California limited liability
 15 company, and ARMSTRONG
 DEVELOPMENT PROPERTIES, INC., a
 16 Pennsylvania corporation,

17 Plaintiffs and Petitioners,

18 v.

19 CITY OF SEBASTOPOL, CITY
 COUNCIL OF THE CITY OF
 20 SEBASTOPOL, and GLENN
 SCHAINBLATT, in his official capacity as
 21 Building Official of the City of Sebastopol,

22 Defendants and Respondents.

Case No. 3:13-cv-01383 EMC

**JOINT STIPULATION CONTINUING
 DISCOVERY DEADLINES;
 [PROPOSED] ORDER**

Ctrm: 5
 Judge: Hon. Edward M. Chen

STIPULATION

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2 1. On November 5, 2013, the Court enter a Case Management and Pretrial
3 Order for Jury Trial (the "Order"). (Dkt. No. 38.) Pursuant to the Order, various discovery
4 deadlines were established.

5 2. On January 9, 2014, Defendants and Respondents City of Sebastopol, City
6 Council of the City of Sebastopol and Glenn Schainblatt (collectively, "Defendants") filed
7 a Motion for Partial Summary Judgment, set for hearing on February 13, 2014. (Dkt. No.
8 42.) A Case Management hearing was also set to take place on February 13, 2014. Both
9 the Motion for Partial Summary Judgment and the Case Management hearing were
10 subsequently continued to February 20, 2014.

11 3. On January 16, 2014, pursuant to a stipulation and order, Plaintiffs and
12 Petitioners Longs Drug Stores California, LLC and Armstrong Development Properties,
13 Inc. (collectively, "Plaintiffs") filed their First Amended Verified Complaint for Injunctive
14 Relief and Damages; Verified Petition for Writ of Mandate (Dkt. No. 47) in this Court
15 against Defendants.

16 4. On February 12, 2014, the Court issued an Order to Show Cause Regarding
17 This Court's Jurisdiction Over Plaintiffs' Writ of Mandate Claims (the "OSC"). (Dkt No.
18 61.) The OSC vacated the hearing on Defendants' Motion for Summary Judgment. The
19 Court also continued the Case Management to March 27, 2014.

20 5. On March 6, 2014, the Court re-set the Motion for Partial Summary
21 Judgment for April 24, 2014. On March 7, 2014, the Court re-set the March 27, 2014 Case
22 Management hearing for April 24, 2014.

23 6. Based on the issuance of the OSC and the procedural posture of the case, the
24 parties' shared understanding was that expert and non-expert discovery deadlines in the
25 Order would be continued. As such, the parties have not engaged in active discovery
26 while the OSC has been pending.

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1 **NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AS FOLLOWS:**

2 1. If the Court maintains jurisdiction over this case, the expert and non-expert
3 discovery deadlines in the Order (Dkt. No. 38) should be continued and re-set at the April
4 24, 2014 Case Management hearing.

5 2. All other hearing dates and deadlines established in the Order (Dkt. No. 38)
6 should likewise be continued and re-set at the April 24, 2014 Case Management hearing.

7 Dated: April 1, 2014

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
ROBERT R. MOORE
DAVID H. BLACKWELL
MICHAEL J. BETZ

8
9
10 By: /s/ Cathy A. Hongola-Baptista

11 CATHY A. HONGOLA-BAPTISTA
12 Attorneys for Plaintiffs and Petitioners
13 LONGS DRUG STORES
14 CALIFORNIA, L.L.C. and
ARMSTRONG DEVELOPMENT
PROPERTIES, INC.

15 Dated: April 1, 2014

MEYERS, NAVE, RIBACK, SILVER &
WILSON

16
17 By: /s/ Edward Grutzmacher

18 EDWARD GRUTZMACHER
19 Attorneys for Defendants and
20 Respondents
21 CITY OF SEBASTOPOL, CITY
COUNCIL OF THE CITY OF
SEBASTOPOL, and GLENN
SCHAINBLATT

22 I hereby attest that I have on file all holographic signatures corresponding to any
23 signatures indicated by a conformed signature (/s/) within this e-filed document.

24 Dated: April 1, 2014

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

25
26 By: /s/ Cathy A. Hongola-Baptista

27 CATHY A. HONGOLA-BAPTISTA
28 Attorneys for Plaintiffs and Petitioners

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[Proposed] ORDER

PURSUANT TO THE ABOVE STIPULATION, IT IS SO ORDERED THAT:

1. The non-expert and expert discovery deadlines set forth in Case Management and Pretrial Order for Jury Trial (Dkt. No. 38) are hereby VACATED.
2. New non-expert and expert discovery deadlines will be established at the April 24, 2014 Case Management hearing.

Dated: 4/2/14 _____

Hon. E
Judge,

