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5 Attorneys for Owner of Record
 Nahla Droubi

7 UNITED STATES DISTRICT COURT
 8 NORTHERN DISTRICT OF CALIFORNIA
 9 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 REAL PROPERTY AND IMPROVEMENTS
 15 LOCATED AT 2366 SAN PABLO AVENUE,
 16 BERKELEY, CALIFORNIA,

17 Defendant.

18 _____
 19 NAHLA DROUBI,

20 Owner of Record.

Case No: CV 13-2027 JST

**JOINT STIPULATED REQUEST
 PURSUANT TO LOCAL RULE 6-2 FOR
 ORDER ENLARGING TIME TO RESPOND
 TO PLAINTIFF’S MOTION FOR
 SUMMARY JUDGMENT; [PROPOSED]
 ORDER PURSUANT TO LOCAL RULE 7-
 12**

Trial Date: None Set

21 **JOINT STIPULATED REQUEST**

22 Pursuant to Local Rule 6-2, all parties to this matter, by and through their respective
 23 attorneys of record, hereby do stipulate and request that the deadline to oppose Plaintiff’s Motion for
 24 Summary Judgment (“MSJ”) be extended by 21 days from April 28, 2014, to May 19, 2014, in
 25 accordance with the Clerk’s notice (Docket #99) that the MSJ hearing has been continued 21 days.
 26
 27
 28

1 The reason for the requested enlargement of time is to provide additional time given the
2 various outstanding issues in this action. There have been no prior modifications in this case.¹ There
3 will be no prejudice to Plaintiff because Plaintiff's reply will run from the new date pursuant to
4 Local Rule 7-3, and there is no prejudice to the Court because the Court will have the same amount
5 of time between the opposition deadline and the hearing that it would have had the hearing not been
6 continued by 21 days. This stipulation is without prejudice to the rights of any party to seek a
7 further enlargement of time.

8 Upon the filing of this stipulation, the pending Rule 6 Motion to Enlarge Time is withdrawn.

9 DATED: April 17, 2014

FLYNN RILEY BAILEY & PASEK LLP

10
11 /s/ David Tillotson

12 David Tillotson
13 Attorneys for Owner of Record
14 Nahla Droubi

15 DATED: April 17, 2014

HENRY G. WYKOWSKI & ASSOCIATES

16
17 /s/ Henry G. Wykowski

18 HENRY G. WYKOWSKI
19 Attorneys for Claimant
20 BERKELEY PATIENTS GROUP, INC.

21 DATED: April 17, 2014

DRUG POLICY ALLIANCE

22
23 /s/ Tamar Todd

24 TAMAR TODD
25 Attorneys for Claimant
26 CITY OF BERKELEY

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28 ¹ Owner filed a motion yesterday on April 16, 2014, seeking similar relief, but the motion has not been ruled upon. Plaintiff contacted Owner on April 17 and graciously agreed to stipulate to the relief requested.

1 DATED: April 17, 2014

SARA M. TAYLOR
Attorney at Law

2
3 _____/s/ Sara M. Taylor

4 Sara M. Taylor
5 Attorney for Claimants,
6 MARY DAVIS, ETIENNE FONTAN,
7 CINDY SMITH, JEFFREY BISHOP,
8 ROBIN BISHOP, GWENDOLYN
9 MCCALOPE

10 DATED: April 17, 2014

MELINDA HAAG
United States Attorney

11 _____/s/ Arvon J. Perteet

12 ARVON J. PERTEET
13 Assistant United States Attorney

14
15 **~~{PROPOSED}~~ ORDER**

16 PURSUANT TO STIPULATION, IT IS SO ORDERED.

17
18 DATED: April 18, 2014

19 JON S. TIGAR
20 UNITED STATES

