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12 Attorneys for Defendants
 PORT OF OAKLAND, WILLIAM MORRISON;
 13 KENNETH TAYLOR; OMAR BENJAMIN;
 WILLIAM EDWARD; KIMBERLY A. LINDERME;
 14 CHERYL PERRY LEAGUE; GINA CARRADINE;
 MICHAEL MITCHELL; TED MANKOWSKI; JOEL
 15 EICHENBERRY; GARY RUTLAND; DENYCE
 16 HOLSEY AND FRANKIE JOHNSON

17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA**

18 Jaimen Joaquin Dominiquez,
 19 Plaintiff,

20 v.

21 Port of Oakland, a Department of the City of
 22 Oakland, a Municipal Corporation; Service
 Employees International Union Local 1021, a
 23 labor union; William Morrison aka Bill
 Morrison, Kenneth Taylor, Omar Benjamin,
 24 William Edward aka Bill Edwards, Kimberly
 A. Linderme, Cheryl Perry League, Gina
 25 Carradine, Millie Cleveland, Michael
 Mitchell, Ted Mankowski, Joel Eichenberry,
 26 Gary Rutland, Denyce Holsey, Frankie
 Johnson and Does 1-100, inclusive,

27 Defendants.
 28

Case No. CV-13-03756-RS

**STIPULATION AND ~~[PROPOSED]~~
 ORDER EXTENDING DEADLINES
 FOR OPPOSITION AND REPLY TO
 DEFENDANTS' MOTION FOR
 JUDGMENT ON THE PLEADINGS**

Date: May 29, 2014
 Time: 1:30 p.m.
 Judge: Hon. Richard Seeborg
 Location: Courtroom 3

1 Pursuant to Local Rules 6-2 and 7-12, Plaintiff Jaimen Joaquin Dominquez (“Plaintiff”)
2 and Defendants, by and through their undersigned counsel, hereby stipulate and request as
3 follows:

4 WHEREAS, on January 9, 2014 the Court entered an Order directing the parties to
5 complete mediation, ideally before April 9, 2014 (ECF No. 30);

6 WHEREAS, on March 5, 2014 the Court entered an ADR Clerk’s Notice assigning Mark
7 LeHocky as mediator (ECF No. 32) and Mr. LeHocky scheduled a mediation session with the
8 parties for April 8, 2014;

9 WHEREAS, on March 20, 2014 Defendants filed a Notice of Motion and Motion for
10 Judgment on the Pleadings (“Motion”) pursuant to FRCP 12(c) (ECF No. 33);

11 WHEREAS, on March 20, 2014 the Court entered the following schedule in the docket
12 for this action (see ECF No. 33):

- 13 1. Responses (i.e. Opposition) to Defendants’ Motion due by April 3, 2014
- 14 2. Reply due by April 10, 2014
- 15 3. Hearing set for May 29, 2014 at 1:30 p.m.

16 WHEREAS, the parties have been working together in good faith to resolve this matter
17 and require additional time to engage in settlement negotiations;

18 WHEREAS, the parties wish to engage in further settlement discussions, including
19 attendance at the April 8, 2014 mediation session, without incurring further or unnecessary
20 litigation expenses;

21 WHEREAS, counsel for Plaintiff is traveling internationally for a period immediately
22 following the mediation session;

23 WHEREAS, in light of the parties’ ongoing settlement discussions and upcoming
24 mediation session, the parties request that the above deadlines for the Opposition and Reply be
25 extended to allow the parties an opportunity to mediate this matter prior to the deadlines for any
26 further filings, and to allow adequate time to prepare their Opposition and Reply papers in the
27 event that this matter is not settled on or before April 8, 2014;

28 WHEREAS, no other time modifications have been made in this action;

1 IT IS HEREBY STIPULATED by and between the parties, through their respective
2 counsel:

3 The deadline for Plaintiff to file and serve his Opposition to Defendants' Motion for
4 Judgment on the Pleadings is extended to May 15, 2014.

5 The deadline for Defendants to file and serve their Reply to Plaintiff's Opposition is
6 extended to May 22, 2014.

7 The hearing scheduled for May 29, 2014 at 1:30 p.m. shall remain scheduled at that time,
8 unless the Court reschedules it for another date.

9 **IT IS SO STIPULATED.**

10 Dated: March 21, 2014

LAW OFFICE OF MANUEL A. JUAREZ

11

By: /s/ Manuel A. Juarez
Manuel A. Juarez

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13

Attorney for Plaintiff
JAIMEN JOAQUIN DOMINIQUEZ

14

15 Dated: March 21, 2014

PORT OF OAKLAND
Danny Wan
Daniel Connolly

16

17

JONES DAY

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By: /s/ Aaron L. Agenbroad
Aaron L. Agenbroad

20

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Attorneys for Defendants
PORT OF OAKLAND
ATTORNEYS FOR DEFENDANTS
PORT OF OAKLAND; WILLIAM
MORRISON; KENNETH TAYLOR; OMAR
BENJAMIN; WILLIAM EDWARD;
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AND FRANKIE JOHNSON

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SIGNATURE ATTESTATION

I hereby attest that I have on file all holograph signatures for any signatures indicated by a “conformed” signature (/S/) within this e-filed document.

Dated: March 21, 2014


JONES DAY

By: /s/ Aaron L. Agenbroad
Aaron L. Agenbroad

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MANKOWSKI; JOEL EICHENBERRY;
GARY RUTLAND; DENYCE HOLSEY
AND FRANKIE JOHNSON

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 3/24, 2014

By: 
The Honorable Richard Seeborg
United States District Court Judge

SFI-856218v1