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5 Attorneys for Defendants
 MB Enterprises, Inc., Massoud Ebrahimi, and
 6 Bhagdeep S. Dhaliwal

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 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

11 RYAN SCHAEFFER, an individual;
 ANNE SCHAEFFER, an individual; and
 12 REESE SCHAEFFER, a minor by and
 through her general guardians Ryan
 13 Schaeffer and Anne Schaeffer,,
 14

Plaintiffs,

15 v.

16 GREGORY VILLAGE PARTNERS, L.P.,
 a California Partnership, et al.,,
 17

Defendants.
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Case No. 3:13-CV-4358 JST

**STIPULATION AND ~~PROPOSED~~ ORDER
 EXTENDING BRIEFING SCHEDULE ON
 PLAINTIFFS' ADDITIONAL MOTIONS FOR
 SUMMARY JUDGMENT AGAINST MB
 ENTERPRISES, INC. AND GREGORY
 VILLAGE PARTNERS, L.P.**

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 20 1. By Order dated December 8, 2014 (docket # 131), the Court established a briefing
 21 schedule with respect to Plaintiffs' request to file additional motions for summary judgment
 22 against Defendants MB Enterprises, Inc. and Gregory Village Partners, L.P. Under that schedule,
 23 Plaintiffs were provided the ability to file their additional summary judgment motions with
 24 respect to liability on selected causes of action against these Defendants no later than January 30,
 25 2015. Defendants' opposition papers were to be filed by March 4, 2015. Plaintiffs' reply papers
 26 were to be filed by March 18, 2015. The motions were set for hearing on April 9, 2015.

27 2. After the Court issued that Order, counsel for Defendant MB Enterprises, Inc.
 28 received an Order from Judge William B. Shubb in the Eastern District of California. By that

STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING BRIEFING SCHEDULE
 Case No. 3:13-CV-4358 JST

BUCHMAN PROVINE BROTHERS SMITH LLP
 ATTORNEYS AT LAW
 WALNUT CREEK, CA

1 Order, Judge Shubb re-calendared the commencement of a jury trial from January 13, 2015 to
2 February 3, 2015. MB Enterprises' counsel represents the Defendants in that jury trial, which is
3 estimated to last three weeks. This trial will prevent counsel from preparing and filing opposition
4 papers by March 4, 2015.

5 WHEREFORE, Plaintiffs, Gregory Village, and MBE stipulate to and respectfully request
6 that this Court amend the existing filing deadlines for Plaintiffs' additional summary judgment
7 motions against Gregory Village and MBE, related filing deadlines, and the date for hearing on
8 both summary judgment motions as follows:

- | | | |
|----|--------------------------|--|
| 9 | February 27, 2015 | Last day for Plaintiffs to file summary judgment motions |
| 10 | April 1, 2015 | Last day for Gregory Village/MBE to file oppositions |
| 11 | April 15, 2015 | Last day for Plaintiffs to file reply papers |
| 12 | May 7, 2015 | Hearing on both summary judgment motions. |

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Dated: January 27, 2015

BUCHMAN PROVINE BROTHERS SMITH LLP

By: /s/Horace W. Green

Horace W Green
Attorneys for Defendants
MB Enterprises, Inc., Massoud Ebrahimi, and
Bhagdeep S. Dhaliwal

Dated: January 27, 2015

PALADIN LAW GROUP® LLP

By: /s/John R. Till

John R. Till
Attorneys for Plaintiffs

Dated: January 27, 2015

STANZLER LAW GROUP

By: /s/Jeffery Curtiss

Jeffery Curtiss
Attorneys for Defendant
Gregory Village Properties, LP, VPI, Inc.

PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that this Court amends the existing filing deadlines and hearing date set forth in Docket Number 131 in this matter to incorporate the dates proposed above.

Dated: January 29, 2015

