1 2 3 4 5 6 7 8	Eugene B. Elliot, State Bar No. 111475 Michael C. Wenzel, State Bar No. 215388 Amy Leifur Halby, State Bar No. 287216 BERTRAND, FOX & ELLIOT The Waterfront Building 2749 Hyde Street San Francisco, California 94109 Telephone: (415) 353-0999 Facsimile: (415) 353-0990 Attorneys for Defendant SONOMA COUNTY JUNIOR COLLEGE DIST (Sued Erroneously herein as SANTA ROSA JUN		
9	UNITED STATI	ES DISTRICT COURT	
10 11	NORTHERN DISTRICT OF CALIFORNIA		
12	JOSIE KOCH,	Case No. 3:13-cv-04512-WHO	
13	Plaintiff,	STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE; ORDER	
14	v.		
15 16	SANTA ROSA JUNIOR COLLEGE, and DOES 1 through 20, inclusive,		
17	Defendants.	Hon. William H. Orrick	
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19	STIP	ULATION	
20	Defendant SONOMA COUNTY JUNIOR COLLEGE DISTRICT and plaintiff JOSIE KOCH by		
21	and through their respective attorneys of record, h	hereby stipulate as follows:	
22	1. By order dated June 12, 2014 the	Settlement Conference before Magistrate Judge Maria-	
23	Elena James was continued to September 26, 201	4 by Magistrate Judge Maria-Elena James.	
24	2. Pursuant to this Court's Order issu	ed on June 12, 2014 the Case Management Conference	
25	scheduled for July 17, 2014 was continued to Oc	tober 14, 2014, with the expectation that the Settlement	
26	Conference will have occurred prior to October	7, 2014. In this same Order, the Court permitted the	
27	Settlement Conference to be rescheduled by the p	parties to a time that was convenient to Magistrate Judge	
~	Maria-Elena James and the parties and did not provide a deadline for attendance at the Settlement 1		
	STIPULATION TO EXTEND DISCOVERY DEADL	INES; ORDER	

US District Court Case No. 3:13-cv-04512-WHO

1 Conference.

2 3. The parties have submitted a stipulation to Settlement Conference Magistrate Judge 3 Maria-Elena James, to have the Settlement Conference currently set for September 26, 2014 rescheduled to December 3, 2014. The parties have respectfully requested that the Settlement Conference be 4 5 rescheduled in order to permit the parties to engage in required pre-conference discovery which has been subject to repeated and ongoing delays due to the belated receipt of plaintiff's discovery responses which 6 7 has also inhibited the scheduling of plaintiff's deposition. The plaintiff's responses to defendant's 8 discovery requests, propounded on April 16, 2014, were not received until August 19, 2014. Absent a 9 rescheduling, the parties will be unable to meaningfully participate in the conference.

4. For all the good cause stated above, the parties respectfully request this Court re-set the
Case Management Conference scheduled for October 14, 2014 to a date after December 3, 2014 as
convenient to the Court.

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5. The parties seek no modification of any other dates or deadlines.

6. The parties respectfully request that the Court approve this stipulation and incorporate its terms in an Order.

IT IS SO STIPULATED.

Dated: August 25, 2014

## BERTRAND, FOX & ELLIOT

By: /s/ Michael C. Wenzel Amy Leifur Halby Attorneys for Defendant SONOMA COUNTY JUNIOR COL Dated: August 25, 2014 CARTER, CARTER, FRIES & C By: /s/ Brian M. Carter Michelle Q. Carter Attorneys for Plaintiff JOSIE KOCH 2 STIPULATION TO EXTEND DISCOVERY DEADLINES; ORDER US District Court Case No. 3:13-cy-04512-WHO	
21       Attorneys for Defendant         22       SONOMA COUNTY JUNIOR COL         23       Dated: August 25, 2014       CARTER, CARTER, FRIES & C         24       Example       By: /s/         25       By: /s/       Brian M. Carter         26       Attorneys for Plaintiff         27       JOSIE KOCH         20       STIPULATION TO EXTEND DISCOVERY DEADLINES; ORDER	
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24 25 26 27 27 27 27 27 27 27 27 27 27	JR COLLEGE DISTRICT
25 26 27 27 27 27 27 27 27 27 27 27	IES & GRUNSCHLAG
26   Brian M. Carter     26   Michelle Q. Carter     27   Attorneys for Plaintiff     20   JOSIE KOCH     20   2	
26 27 27 27 27 20 2 STIPULATION TO EXTEND DISCOVERY DEADLINES; ORDER	
27 27 27 27 27 27 27 2 2 STIPULATION TO EXTEND DISCOVERY DEADLINES; ORDER	
27 JOSIE KOCH 2 STIPULATION TO EXTEND DISCOVERY DEADLINES; ORDER	
2 STIPULATION TO EXTEND DISCOVERY DEADLINES; ORDER	
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STIPULATION TO EXTEND DISCOVERY DEADLINES; ORDER	

1	<u>ORDER</u>
2	GOOD CAUSE APPEARING THEREFORE, and the parties' having stipulated to the same, the
3	parties' stipulation is hereby APPROVED. The Case Management Conference scheduled for October
4	14, 2014 at 2:00 p.m. is continued to December 9, 2014 at 2:00 p.m.
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6	IT IS SO ORDERED.
7	Detect: August 26 2014
8	Dated: August 26, 2014
9	United States District Court Judge
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	3 STIPULATION TO EXTEND DISCOVERY DEADLINES; ORDER