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6 Attorneys for Plaintiff  
7 RICKEY CLAY aka  
8 BAKARI OLATUNJI  
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11 **UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**  
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14 RICKEY CLAY also known as  
15 BAKARI OLATUNJI

Case No. C13-4633 NC

16 Plaintiff,  
17 vs.

STIPULATION TO CONTINUE  
DEADLINE CASE MANAGEMENT  
CONFERENCE AND ALL RELATED  
DATES AND ~~PROPOSED~~ ORDER

18 CITY OF OAKLAND, DEANNA  
19 SANTANA, BLAIR ALEXANDER, R.  
20 VAN SLOTEN, MARCOS CAMPOS,  
21 DOES 1-250.

Complaint Filed: October 7, 2013

Defendants.

22 The parties herein hereby stipulate and jointly apply to the Court for relief from  
23 existing deadlines in the above-referenced matter as follows:

24 The parties had agreed to a voluntary settlement conference with Magistrate Judge  
25 Laurel Beeler. The initial settlement conference was originally held on August 5, 2014. The  
26 parties and Magistrate Judge Beeler have agreed that further settlement discussions would be  
27 productive. At the suggestion of Magistrate Beeler, the parties have agreed engage in certain  
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1 informal discovery. Plaintiff is scheduled to report back to Judge Beeler on September 9,  
2 2014. It is contemplated that a further settlement conference will be held after September 9,  
3 2014. The parties and Judge Beeler feel that the interest of justice will be served if the case  
4 management conference, currently set for September 10, 2014, were continued until after the  
5 parties have had an opportunity to participate in this settlement process.

6 As a consequence, the parties jointly request that the Court continue the present  
7 deadlines for completion of the settlement conference with Judge Beeler, for filing of the  
8 joint case management conference statement, the date of the case management conference,  
9 the deadlines associated with defendant Santana's 12(c) motion for judgment on the  
10 pleadings, and discovery as follows:

- 11 • Completion of settlement conference with Judge Laurel Beeler: October 15, 2014;
- 12 • Filing of joint case management conference statement: November 5, 2014;
- 13 • Case management conference: November 12, 2014, at 10:00 am (or at the same  
14 time as the hearing on defendant Santana's 12(c) motion);
- 15 • Hearing on defendant Santana's 12(c) motion: November 12, 2014, at 1:00 pm (or  
16 at the same time as the CMC);
- 17 • Plaintiff's Opposition to the 12(c) motion due: October 22, 2014;
- 18 • Defendant's Reply in support of the 12(c) motion due: November 5, 2014;
- 19 • Parties agree that the depositions of defendants Santana will be completed by  
20 October 21, 2014, if a settlement is not reached; and the deposition of defendant  
21 VanSloten will be rescheduled to a mutually convenient time for all parties.

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23  
24 DATED: August 15, 2014

YOLANDA HUANG, ESQ.

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27 By: /s/ Yolanda Huang  
28 YOLANDA HUANG, ESQ.  
Attorney for Plaintiff

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DATED: August 15, 2014

OAKLAND CITY ATTORNEY

By: /s/ Wendy Garbers  
WENDY GARBERS, ESQ.  
Attorneys for Defendants  
CITY OF OAKLAND, et al

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**ORDER**

GOOD CAUSE appearing therefor, and the parties having so stipulated, the Court hereby GRANTS the parties' joint application for continuance of all existing deadlines and hearing and filing dates as follows:

- Completion of settlement conference with Judge Laurel Beeler: October 15, 2014;
- Filing of joint case management conference statement: November 5, 2014;
- Case management conference: November 12, 2014, at ~~10:00 am~~ <sup>1:00 p.m.</sup> (or at the same time as the hearing on defendant Santana's 12(c) motion);
- Hearing on defendant Santana's 12(c) motion: November 12, 2014, at 1:00 pm (~~or at the same time as the CMC~~);
- Plaintiff's Opposition to the 12(c) motion due: October 22, 2014;
- Defendant's Reply in support of the 12(c) motion due: November 5, 2014;
- Parties agree that the depositions of defendants Santana will be completed by October 21, 2014, if a settlement is not reached; and the deposition of defendant VanSloten will be rescheduled to a mutually convenient time for all parties.

IT IS SO ORDERED

Dated: August 20, 2014

