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Attorneys for Plaintiff  
 VICTOR GUERRERO

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

VICTOR GUERRERO,  
 Plaintiff,

v.

CALIFORNIA DEPARTMENT OF  
 CORRECTIONS AND REHABILITATION;  
 STATE PERSONNEL BOARD; and, in their  
 official capacities, JEFFREY BEARD,  
 Secretary of the California Department of  
 Corrections and Rehabilitation; SUZANNE  
 AMBROSE, Executive Officer of State  
 Personnel Board; K. CARROLL, Lieutenant;  
 D. SHARP, Sergeant; BARBARA  
 LEASHORE, Hearing Officer; C. HESTER,  
 Lieutenant; V. MAYOL, Lieutenant; S.  
 COX, Lieutenant; V. MYERS, Sergeant;  
 JOHN (OR JANE) DOES 1-100, all of  
 whose names are unknown,

Defendants.

Case No. 3:13-cv-05671-WHA

**STIPULATION AND [~~PROPOSED~~]  
 ORDER ENLARGING TIME FOR  
 SUBMISSION OF PLAINTIFF’S  
 MOTION FOR ATTORNEYS’ FEES AND  
 BILL OF COSTS**

[Civ. L.R. 6-2]

[Hon. William Alsup]

1 As the Court entered judgment in this matter on September 28, 2015, Plaintiff currently  
2 has 13 days, or until October 12, 2015, by which to file a motion for attorneys' fees and a bill of  
3 costs relating to his litigation expenses pursuant to Fed.R.Civ.P. 54(d) and Civ. L.R. 54-1 and  
4 54-5. The parties to this matter hereby stipulate pursuant to Local Rule 6-2, however, that the  
5 Plaintiff may have additional time, up until and including October 30, 2015, by which to file the  
6 two aforementioned matters. The proposed enlargement of time will permit the parties an  
7 adequate opportunity to meet and confer in an effort to resolve the fees and costs matters without  
8 the need for the Court's involvement. A declaration to this effect is filed herewith.

9 In the event that the parties are unable to informally resolve those matters, the parties  
10 further request that Defendants have 21 days, or until November 20, 2015 to file their  
11 oppositions, and that in view of the Thanksgiving holiday, Plaintiff have until December 3, 2015  
12 to file his replies. The parties further request that the hearing on both matters be set for  
13 December 17, 2015.

14 A proposed order is lodged herewith.

15  
16 Dated: September 29, 2015

Respectfully submitted,

17 Christopher Ho  
18 THE LEGAL AID SOCIETY –  
19 EMPLOYMENT LAW CENTER

20  
21 By: \_\_\_\_\_  
22 CHRISTOPHER HO

23 Attorneys for Plaintiff  
24 VICTOR GUERRERO

25 Dated: September 29, 2015

26 Miguel A. Neri  
27 Fiel D. Tigno  
28 Christopher M. Young

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By: \_\_\_\_\_  
MIGUEL A. NERI

Attorneys for Defendant CDCR and Individual  
CDCR Defendants

Dated: September 29, 2015

Alvin Gittisriboongul  
Dorothy Bacskai Egel

By: \_\_\_\_\_  
DOROTHY BACSKAI EGEL

Attorneys for Defendant SPB and Individual SPB  
Defendants

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**[PROPOSED] ORDER**

Good cause appearing, the stipulation of the parties is approved. Plaintiff may file his motion for attorneys' fees and bill of costs in this matter by no later than October 30, 2015. Defendants shall have until November 20, 2015 to file their oppositions thereto. Plaintiff's reply briefs will be due on December 3, 2015. The hearing on both matters will be set for December 17, 2015, at 8:00 a.m.

**SO ORDERED.**

Dated: September 30, 2015.

  
\_\_\_\_\_  
WILLIAM ALSUP  
UNITED STATES DISTRICT JUDGE