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9 Attorneys for Defendant
United States of America

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

14 SANJAY BHATNAGAR,

15 Plaintiff,

16 v.

17 UNITED STATES OF AMERICA,

18 Defendant.

) Case No. 14-cv-00327-MEJ

) **STIPULATION AND ~~[PROPOSED]~~ ORDER**
) **EXTENDING DEADLINES**

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20
21 **JOINT STIPULATION**

22 Whereas counsel for plaintiff has asked to move the hearing date to February 2, 2017, due to
23 scheduling difficulties that have arisen since the parties agreed to the January 12, 2017, hearing date;

24 Whereas counsel for defendant has asked for a short extension of the December 16, 2016,
25 deadline for its reply in support of the pending motion for summary judgment;

26 Whereas the parties wish to accommodate these scheduling requests; and

27 Whereas the proposed scheduling changes will not affect any other deadlines in the case or the
28 May 2017 trial date;

STIPULATION AND [PROPOSED] ORDER
14-CV-00327 MEJ

1 The parties hereby stipulate and agree to continue the following dates in connection with the
2 pending motion for summary judgment:

Event	Current Date	New Date
Deadline to file reply	December 16, 2016	December 21, 2016
Hearing on dispositive motion	January 12, 2017, 10 a.m.	February 2, 2017, 10 a.m.

6 Dated: December 16, 2016

FARELLA BRAUN +MARTEL LLP

7 By: /s/ Julia Kropp

8 JULIA KROPP

9 Attorneys for Plaintiff Sanjay Bhatnagar

10 Dated: December 16, 2016

BRIAN J. STRETCH

United States Attorney

12 By: /s/ Robin M. Wall

13 ROBIN M. WALL

Assistant United States Attorney

14 Attorneys for Defendant

16 **CERTIFICATION**

17 Pursuant to Civil Local Rule 5-1(i)(3), the undersigned hereby attests that Julia Kropp has
18 concurred in the filing of this document.

19 Dated: December 16, 2016

BRIAN J. STRETCH

United States Attorney

21 By: /s/ Robin M. Wall

22 ROBIN M. WALL

Assistant United States Attorney

23 Attorneys for Defendant

1 ~~PROPOSED~~ ORDER

2 In accordance with the stipulation and agreement between the parties, IT IS ORDERED that the
3 schedule in this case be amended as follows:

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Event	Current Date	New Date
Deadline to file reply	December 16, 2016	December 21, 2016
Hearing on dispositive motion	January 12, 2017, 10 a.m.	February 2, 2017, 10 a.m.

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8 Date: December 19, 2016


HONORABLE MARIA-ELENA JAMES
UNITED STATES MAGISTRATE JUDGE