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 CITY AND COUNTY OF SAN FRANCISCO

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10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

12 GREGG S. BOSNAK,

13 Plaintiff,

14 vs.

15 THE CITY AND COUNTY OF SAN
 FRANCISCO, LAGUNA HONDA
 16 HOSPITAL AND REHABILITATION
 CENTER,

17 Defendant(s).

Case No. CV 14-01429JSC

**STIPULATION AND ORDER
 TO CONTINUE CASE MANAGEMENT
 CONFERENCE**

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 20 Plaintiff Gregg S. Bosnak originally filed this action on March 28, 2014. At the time, he
 21 requested leave to proceed *In Forma Pauperis*. On March 31, 2014, the Court issued an initial
 22 scheduling Order, which, among other things, set a case management conference for August 14, 2014.

23 On April 14, 2014, the Court granted Plaintiff's application to proceed *In Forma Pauperis*.

24 On May 15, 2014, the Court dismissed Plaintiff's complaint *sua sponte*, with leave to file an
 25 amended Complaint. On June 5, 2014, Plaintiff filed the First Amended Complaint (FAC). On June
 26 30, 2014, the Court entered an Order to Issue Summons. The Court issued the Summons on July 10,
 27 2014 to the United States Marshall's Office. The United States Marshall's Office served the
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1 Summons and FAC on Defendant City and County of San Francisco, including its constituent
2 department Laguna Honda Hospital and Rehabilitation Center, on July 21, 2014. The City's response
3 to the FAC currently is due on or before August 11, 2014.

4 Given the delay in service, the parties have not had sufficient time to satisfy the requirements
5 of the initial scheduling order such as compliance with the meet and confer requirements under
6 Federal Rule 26(f) or ADR certification under Civil Local Rule 16-8(b). Nor are the parties prepared
7 to prepare and file a joint case management conference statement by August 7, 2014 as required by the
8 scheduling order.

9 According, **IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES**, that:

10 1. The City shall have an extension of time up to and including September 2, 2014 to
11 respond the First Amended Complaint;

12 2. The August 14, 2014 case management be continued 77-days to October 30, 2014, or as
13 soon thereafter as the conference may be scheduled, to provide the parties with additional time to
14 prepare for the initial case management conference. The parties further seek a corresponding
15 extension of the other dates set forth in the March 31, 2014 initial scheduling order.

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1 The parties respectfully request that the Court enter an order commemorating this stipulation.

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3 Dated: August 4, 2014

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5 DENNIS J. HERRERA
City Attorney
6 ELIZABETH S. SALVESON
Chief Labor Attorney
7 JONATHAN ROLNICK
Deputy City Attorney
8

9 By: /s/ Jonathan Rolnick
10 JONATHAN ROLNICK¹

11 Attorneys for Defendant
12 CITY AND COUNTY OF SAN FRANCISCO

13 Dated: August 4, 2014

14
15 The Legal Aid Society-Employment Law Center

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18 By: /s/ William C. McNeill III
19 WILLIAM C McNEILL III
Attorney for Plaintiff GREGG S. BOSNAK
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28 ¹ The City's counsel obtain the consent of plaintiff's counsel to the filing of this stipulation and proposed order.

