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7
 8 UNITED STATES DISTRICT COURT
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 10 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

11 JENNIFER K. LOVETT,
 12 Plaintiff,
 13 vs.
 14 OMNI HOTELS & RESORTS, OMNI
 HOTELS MANAGEMENT
 CORPORATION, and DOES ONE through
 15 ONE HUNDRED
 16 Defendants.

CASE NO. 3:14-CV-02844-RS

STIPULATION AND ~~[PROPOSED]~~ ORDER:

(1) EXTENDING OMNI'S TIME TO REPLY TO PLAINTIFF'S SUMMARY JUDGMENT OPPOSITION [DKT. 89]
(2) EXTENDING PLAINTIFF'S TIME TO REPLY TO OMNI'S OPPOSITION TO MOTION TO AMEND [DKT. 90]; AND
(3) PERMITTING PLAINTIFF TO LATE-FILE DECLARATION IN SUPPORT OF HER OPPOSITION TO OMNI'S MOTION FOR SUMMARY JUDGMENT

19 Pursuant to Civil Local Rule 7-12, plaintiff Jennifer K. Lovett and defendant Omni Hotels
 20 Management Corporation ("Omni") stipulate as follows:

21 WHEREAS, on July 2, 2015, Omni filed a Motion for Summary Judgment (Dkt. 59);
 22 WHEREAS, the Court set a September 25, 2015 deadline for Omni's reply brief (Dkt. 68);
 23 WHEREAS, on August 28, 2015, Plaintiff filed a Motion for Leave to Amend (Dkt. 83);
 24 WHEREAS, the Court set both motions for hearing on November 5, 2015 (Dkt. 86);
 25 WHEREAS, Omni's counsel had a bench trial in San Francisco Superior Court this week
 26 and therefore requests additional time to file its Reply;

27 WHEREAS, Plaintiff does not oppose Omni's request for a one-week extension to file its
 28 Reply;

1 WHEREAS, Plaintiff was unable to speak with declarant Mark Cibrario and obtain his
2 declaration until after the deadline for her opposition to Summary Judgment and wishes to file the
3 Declaration of Mark Cibrario in support of her Opposition;

4 IT IS THEREFORE STIPULATED as follows:

5 1. Omni shall have until October 2, 2015 to file its reply in support of Summary
6 Judgment. The deadline is extended by one week from September 25 to October 2, 2015;

7 2. Plaintiff shall have until September 25, 2015 to file her reply in support of her
8 Motion to Amend. The deadline is extended by one week from September 18 to September 25,
9 2015;

10 3. Plaintiff shall be permitted to file the Declaration of Mark Cibrario. Omni waives
11 any objection to timeliness but preserves all other objections to his declaration; and

12 4. The hearing date on both motions remains November 5, 2015.

13
14 DATED: September 16, 2015 WALKUP, MELODIA, KELLY, & SCHOENBERGER

15
16 By: /s/ Doris Cheng
17 Doris Cheng
18 Attorney for Plaintiff JENNIFER LOVETT

19 DATED: September 16, 2015 LEWIS BRISBOIS BISGAARD & SMITH LLP

20
21 By: /s/ Thomas A. Rector
22 Thomas A. Rector
23 Attorneys for Defendant OMNI HOTELS
MANAGEMENT CORPORATION

24 IT IS SO ORDERED.

25 DATED: 9/17/15
26 
27 RICHARD SEEBORG
United States District Judge

28 4814-5585-7960.1 c