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12 Attorneys for Plaintiff
 KUIANA TAYLOR

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 14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA

16 KUIANA TAYLOR,

17 Plaintiff,

18 vs.

19 CITY AND COUNTY OF SAN
 FRANCISCO,

20 Defendant.

Case No. CV 14 3555 CRB

**STIPULATED MOTION FOR
 ADMINISTRATIVE RELIEF; AND
 [PROPOSED] ORDER ALLOWING PARTIES
 TO FILE DISCOVERY LETTER REGARDING
 PRODUCTION OF CITY DOCUMENTS AND
 IDENTIFICATION OF CITY EMPLOYEES
 RECEIVING PUBLIC ASSISTANCE**

Civ. Local Rules 7-11 and 7-12

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 24 Plaintiff Kuiana Taylor and Defendant City and County of San Francisco (collectively, “the
 25 parties”) hereby move this Court for an order allowing the parties to file a letter brief setting forth the
 26 parties' respective positions regarding the production of City documents and identification of City
 27 employees in the City’s Jobs Now program, the job program in which Plaintiff participated. In order
 28 to qualify for the Jobs Now program, individuals must have received public assistance in the past. It is

1 the City's position that information identifying employees who are receiving public assistance is
2 protected by California Welfare and Institutions Code section 10850 which makes the disclosure of
3 such information a misdemeanor under California law. It is Plaintiff's position that this information is
4 highly relevant and necessary for Plaintiff to litigate her discrimination and harassment claims against
5 the City because a number of these individuals were witnesses to Plaintiff's alleged harassment and/or
6 alleged similar claims of harassment against Plaintiff's supervisor.

7 The Parties hereby make this Stipulated Motion for Administrative Relief in order to timely
8 resolve this discovery dispute so that documents can be produced and an initial round of depositions
9 can occur before the Court ordered mediation, currently set for May 20, 2015, takes place. Waiting 35
10 days to resolve this dispute through formal motion procedures would needlessly delay the process and
11 possibly prevent the parties from adequately preparing for the mediation. Moreover, filing a single
12 letter outlining the parties respective positions will reduce the attorney time spent resolving this
13 dispute.

14 Dated: January 28, 2015

LEGAL AID SOCIETY

15 By: /s/Rachael Langston
16 RACHAEL LANGSTON

17 Attorney for Plaintiff
18 KUIANA TAYLOR

19 dated: January 28, 2015

DENNIS J. HERRERA
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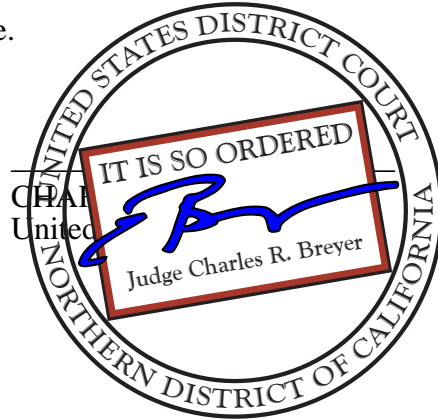
22 By: /s/Erik A. Rapoport
23 ERIK A. RAPOPORT
24 Attorney for Defendant

25 CITY AND COUNTY OF SAN FRANCISCO
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~~Proposed~~ ORDER

The Court has reviewed the Parties Stipulated Motion for Administrative Relief. Good cause appearing, and PURSUANT TO STIPULATION, IT IS SO ORDERED – The Parties may file a single letter outlining their respective positions regarding the City’s production of documents and identification of City employees receiving public assistance.

Dated: February 3, 2015



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