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14 Attorney for Plaintiff
 15 GREGORY NOVOA

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA
 18

19 GREGORY NOVOA,

20 Plaintiff,

21 vs.

22 CITY AND COUNTY OF SAN
 FRANCISCO, SAN FRANCISCO
 23 MUNICIPAL TRANSIT AGENCY, DEBRA
 FRANKS, MIKE HELMS, and DOES 1-40,

24 Defendants.
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Case No. C 14-03617-JST

**JOINT STIPULATION REGARDING
 DISCOVERY DEADLINES UNDER CIVIL
 LOCAL RULE 6-2(A); ~~PROPOSED~~ ORDER**

Judge: Honorable Jon S. Tigar
 Court: 450 Golden Gate, Courtroom 9 (Floor 19)

File Date: June 13, 2013
 Trial Date: January 11, 2016

1 Pursuant to Civil Local Rule 6-2(a), Plaintiff Gregory Novoa and Defendants City and County
2 of San Francisco and Deborah Franks hereby submit the following stipulation and proposed order
3 regarding Defendants' motion to compel deadline.

4 1. On November 17, 2014, the Court issued the following deadlines as part of its case
5 management schedule:

6 Fact Discovery Cut-Off:	May 18, 2015
7 Deadline to File Dispositive Motions:	July 2, 2015
8 Trial Date:	January 11, 2016

9 (Dkt. No. 19.) Through this stipulation, the parties are jointly requesting an extension permitting
10 Defendants to file a motion to compel regarding their document requests after the dispositive motion
11 hearing in this matter, if such a motion to compel is needed. This is the parties' first request to modify
12 any deadlines in this case.

13 2. Defendants served document requests on Plaintiff on April 17. Plaintiff was required to
14 respond by May 18, but no responses were provided. Defendants are willing to move for summary
15 judgment without raising this discovery dispute to the Court at this time, but only if Defendants are
16 permitted to file a motion to compel — if needed — after the Court rules on their motion for summary
17 judgment. The parties therefore jointly request that Defendants' motion to compel deadline under
18 Civil Local Rule 37-3, with respect to only the document requests served on April 17, be extended
19 until 30 days after the Court rules on Defendants' summary judgment motion. Such an extension will
20 not affect any other deadlines in this case or the trial date, which is not until January 11, 2016.

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1 Dated: May 20, 2015

DENNIS J. HERRERA
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5 By: /s/ Boris Reznikov
BORIS REZNIKOV
6 Attorneys for Defendant(s)
CITY AND COUNTY OF SAN FRANCISCO
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8 Dated: May 20, 2015

RUSSELL A. ROBINSON
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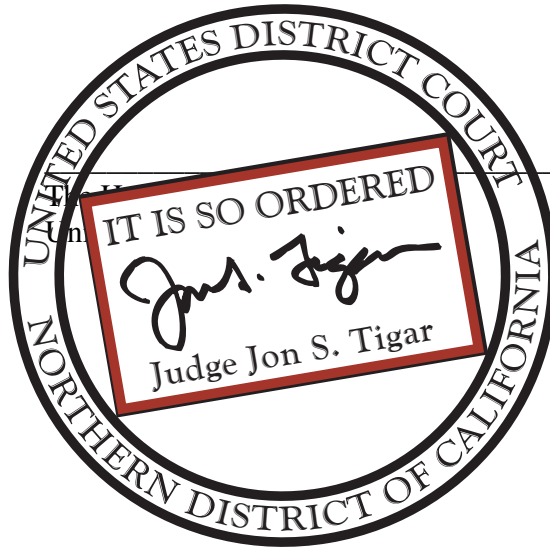
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11 By: /s/ Russell A. Robinson
RUSSELL A. ROBINSON
12 Attorney for Plaintiff
GREGORY NOVOA
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~~PROPOSED~~ ORDER

Pursuant to Plaintiff Gregory Novoa's and Defendants City and County of San Francisco and Deborah Franks' stipulation, it is hereby ordered as follows:

Defendants' motion to compel deadline for the document requests they propounded on Plaintiff on April 17, 2015 is extended until 30 days after the Court rules on Defendants' summary judgment motion.

Dated: May 26, 2015



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