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15 Attorneys for Defendant GCA Services Group of Texas, LP (erroneously sued as GCA Services
 16 Group, Inc.)

17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA**

19	Christopher O’Halloran, Devon Oliver,)	Case No.: 3:15-cv-00868-HSG
20	and Davion McFarland)	
21)	PROPOSED SCHEDULING ORDER
22	Plaintiffs,)	
23)	
24	vs.)	
25)	
26	GCA Services Group, Inc., and DOES 1 to)	
27	20,)	
28	Defendants.)	

1 On June 9, 2015, the Parties' counsel appeared before the Court for a Fed. R. Civ. P. 16
2 Case Management Conference. At the Case Management Conference, the Court indicated that
3 all fact discovery in this case should be completed by no later than January 15, 2016, motions to
4 amend the complaint should be filed by June 23, 2015, and the first day of trial should be set
5 two months or ten weeks from the dispositive motion hearing date. (Docket No. 25) The Court
6 ordered the Parties' counsel to meet and confer further concerning all other case management
7 deadlines.
8

9 The parties have met and conferred regarding the relevant dates and sought to structure a
10 timeline permitting the parties to consider mediation after the court's ruling on dispositive
11 motions and before work on trial preparation begins in earnest.
12

13 **Defendant's Position:**

14 If the last day to hearing dispositive motions is March 31, 2016, a 60-day window
15 between the ruling and the beginning of trial preparation would be approximately June 15.
16 Allowing 30 days for trial preparation would yield a trial date of approximately July 15.
17 However, lead trial counsel for Plaintiffs is out of the country from the beginning of July to
18 mid-August. Thus, the trial date must be moved to early June or early September. Defendant's
19 position is that moving it to early June would make it difficult for the parties to hold a mediation
20 after obtaining a ruling on dispositive motions and before beginning trial preparation.
21 Defendant's position is that moving it to early September would impose a modest delay but
22 would have no other consequence.
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1 **Plaintiffs' Position:**


2 If the last day to hear dispositive motions is March 31, 2016, a 60-day window between
3 the hearing and the first day of trial would be approximately May 30, 2016. A ten-week
4 window would set the first day of trial for approximately June 9, 2016.
5

6 Plaintiffs do not object to a September trial date. However, if the Court is inclined to set
7 the trial date within sixty days or ten weeks of the dispositive motion hearing date, Plaintiffs
8 request that the trial be set for no later than June 13, 2016, given that Plaintiffs' lead trial
9 counsel will be out of the country for most of July and August.
10

11 Accordingly, after having had met and conferred with each other, the Parties and their
12 counsel hereby suggest that the Court set the following case management deadlines:

13	Fact discovery cutoff:	January 15, 2016
14	Last day to disclose experts:	February 15, 2016
15	Last day to disclose rebuttal experts:	March 16, 2016
16	Last day to hear dispositive motions:	March 31, 2016
17	Last day to complete expert discovery:	June 3, 2016
18	Final pretrial conference:	June 6, 2016 or August 29, 2016
19		30
20	Trial:	June 13, 2016 or September 5, 2016

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22 Signed this 4th day of August, 2015.

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26 Honorable Haywood S. Gilliam,
27 UNITED STATES DISTRICT JUDGE
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1 Respectfully submitted,

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3 LAW OFFICES OF JOSEPH ALIOTO AND ANGELA
4 ALIOTO

5 By: /s/ Matthew J. Wayne
6 Matthew J. Wayne
7 Attorneys for Plaintiffs

8 CAROTHERS DISANTE & FREUDENBERGER LLP

9
10 By: /s/ Nicole A. Legrottaglie
11 Nicole A. Legrottaglie
12 Attorneys for Defendant
13 GCA Services Group of Texas, LP

14 **LOCAL RULE 5-1 ATTESTATION**

15 In accordance with U.S. District Court for the Northern District of California Civil
16 Local Rule 5-1(i)(3), the filing attorney attests that concurrence in the filing of this document
17 has been obtained from each of the other Signatories, which shall serve in lieu of their
18 signatures on the document. The filing attorney will maintain records to support this
19 concurrence for subsequent production for the Court, if so ordered, or for inspection upon
20 request by a party, until one year after the final resolution of the action (including appeal, if
21 any).

22 Dated: June 30, 2015

23 LAW OFFICES OF JOSEPH ALIOTO AND ANGELA
24 ALIOTO

25 By: /s/ Matthew J. Wayne
26 Matthew J. Wayne
27 Attorneys for Plaintiffs
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