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Attorneys for Federal Defendant

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

13 ANGELA JENKINS,
14 Plaintiff,

15 v.

16 JOHN KERRY, SECRETARY, UNITED
17 STATES DEPARTMENT OF STATE,
18 Defendant.

) Case No. 15-cv-01921 RS (JCS)

) **STIPULATION AND MOTION TO CONTINUE**
) **DISCOVERY, DISPOSITIVE MOTION, AND**
) **TRIAL DATES; [~~PROPOSED~~] ORDER**

22 **STIPULATION AND MOTION**

23 After meeting on December 1, 2016, as ordered by Magistrate Judge Joseph C. Spero, and with
24 the assistance of Judge Spero, the parties have reached agreement regarding an extension of the
25 discovery deadline to permit a number of depositions as listed below.

26 The parties stipulate and agree to continue the discovery deadline to permit the following
27 depositions:
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STIP. TO CONTINUE SCHEDULE; [PROPOSED] ORDER
15-CV-01921 RS

EVENT	DATE
Deposition of Angela Jenkins	December 20, 2016
Deposition of Tiffany Bartish	January 6, 2017, or January 9, 2017, the specific date to be confirmed by December 2, 2016
Deposition of Amha Gezahegn	January 10, 2017 or January 25, 2017, to be determined based on the witness's availability
Deposition of Brian Ray	Date to be determined based on the witness's availability, but no later than February 16, 2016
Deposition of Elizabeth Norris	Date to be determined based on the witness's availability, but no later than February 16, 2016
Deposition of Susan Moore	Date to be determined based on Ms. Moore's medical availability. Defendant's counsel will help coordinate the scheduling and inform plaintiff's counsel when Ms. Moore becomes available. If Ms. Moore has not become available by February 2, 2017, plaintiff reserves the right to seek a continuance of the trial date.

Dated: December 1, 2016

BRIAN J. STRETCH
United States Attorney

/s/ Robin M. Wall
ROBIN M. WALL
Assistant United States Attorney
Attorneys for Defendant

LAW OFFICES OF MAUREEN E. MCFADDEN

/s/ Maureen E. McFadden
MAUREEN E. MCFADDEN
Attorneys for Plaintiff
ANGELA JENKINS

1 **CERTIFICATION**

2 Pursuant to Civil L.R. 5-1(i)(3), the undersigned hereby attests that Maureen E. McFadden has
3 concurred in the filing of this document.

4 Dated: December 1, 2016

BRIAN J. STRETCH
United States Attorney

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6 */s/ Robin M. Wall*
7 ROBIN M. WALL
8 Assistant United States Attorney
9 Attorneys for Defendant
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1 **[PROPOSED] ORDER**

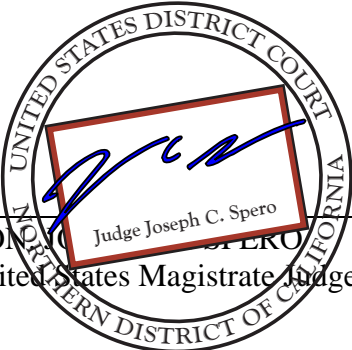
2 Pursuant to the parties' stipulation and for good cause shown, discovery shall be continued in
3 this case to permit the following depositions on the dates and subject to the conditions set forth
4 below:

EVENT	DATE
Deposition of Angela Jenkins	December 20, 2016
Deposition of Tiffany Bartish	January 6, 2017, or January 9, 2017, the specific date to be confirmed by December 2, 2016
Deposition of Amha Gezahegn	January 10, 2017 or January 25, 2017, to be determined based on the witness's availability
Deposition of Brian Ray	Date to be determined based on the witness's availability, but no later than February 16, 2016
Deposition of Elizabeth Norris	Date to be determined based on the witness's availability, but no later than February 16, 2016
Deposition of Susan Moorse	Date to be determined based on Ms. Moorse's medical availability. Defendant's counsel will help coordinate the scheduling and inform plaintiff's counsel when Ms. Moorse becomes available. If Ms. Moorse has not become available by February 2, 2017, plaintiff reserves the right to seek a continuance of the trial date.

18 IT IS SO ORDERED.

19 Dated: 12/1/16

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HONORABLE JUDGE JOSEPH C. SPERO
United States Magistrate Judge