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11 Attorneys for Plaintiffs

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA

14 EILIEEN BROWN, et al.
 15 Plaintiffs,
 16 vs.
 17 FREEDOM WEST HOMES, INC., et al.
 18 Defendants.
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Case No. 3:15-cv-04874-EMC

**STIPULATION AND ~~[PROPOSED]~~
 ORDER REGARDING DISCOVERY**

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1 Plaintiffs EILEEN BROWN, PRENTISS BELTON, MICHELLE HARRIS, EVELYN
2 JONES-MACGLAUN, ETHEL BENSON, KEISHA FINLEY, KEISHA JONES, DOROTHA
3 GRAHAM, BARBARA KERLEGAN, CORINNE HARPER, DEENA PERKINS, LESSIE
4 BROWN, SABRINA PARISH, ELLYN GINDEN-COOPER, TANYA TWYMAN, ZELPHIA
5 CONNOR, ANTOINETTE BLUE and LASHAWN JEFFRIES (collectively, “Plaintiffs”), and
6 Defendant FREEDOM WEST HOMES (“FWH”), ALTON MANAGEMENT CORPORATION
7 (“Alton”), WILLIAM HUTTON (“Hutton”), RAYMOND BROWN (“R. Brown”) and ANASON
8 WON PAK (“Pak”) (Plaintiffs, Alton, Hutton, R. Brown, Pak and FWH are referred to collectively
9 as the “Parties”) through their respective counsel of record, hereby stipulate as follows:

10 WHEREAS the Trial date in this matter remains November 5, 2018;

11 WHEREAS the Parties have worked collaboratively to create a mutually agreeable
12 deposition schedule in this case that accommodated the schedules of counsel as well as the
13 unusually numerous Plaintiffs, Defendants, and witnesses;

14 WHEREAS Parties, witnesses, and counsel for the Parties have had numerous conflicts
15 including trial schedules in other cases that have not permitted the depositions to take place prior to
16 the close of discovery set for May 26, 2018;

17 The Parties have agreed that, subject to the court’s entry of an order pursuant to this
18 stipulation, the remaining plaintiffs’ depositions shall be taken prior to the date set for mediation,
19 June 14, 2018, and the date for the close of non-expert discovery shall be modified such that non-
20 expert discovery shall close on June 22, 2018. All other dates set by the court remain unchanged.

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1 Dated: June 5, 2018

PERETZ & ASSOCIATES

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By: (-) Yosef Peretz
Yosef Peretz
Attorneys for Plaintiffs

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Dated: June 5, 2018
CLARK HILL LLP,

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By: (-) Sara B. Allman
Sara B. Allman
Attorneys for Defendants
ALTON MANAGEMENT CO. and
WILLIAM HUTTON

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9 Dated: June 5, 2018

NIXON PEABODY

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By: (-) Neal P. Gauger
Neal P. Gauger
Attorneys for Defendants
RAYMOND BROWN and
FREEDOM WEST HOMES, INC.

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Dated: June 5, 2018

HINSHAW & CULBERTSON LLP

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By: (-) David Ian Dalby
David Ian Dalby
Attorneys for Defendant
ANASON WON PAK

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19 I attest that concurrence in the filing of the document has been obtained from the above
20 signatories.

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21 Dated: June 5, 2018

PERETZ & ASSOCIATES

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By: (-) Yosef Peretz
Yosef Peretz
Attorneys for Plaintiffs

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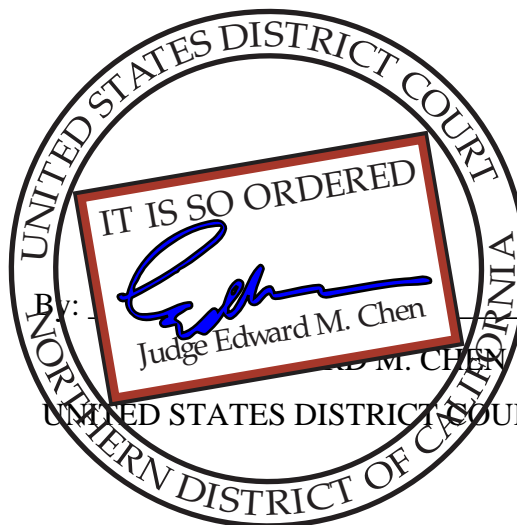
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~~[PROPOSED]~~ ORDER

Pursuant to the Parties' stipulation, and good cause appearing therefore, the Court hereby orders that the remaining plaintiffs' depositions shall be taken prior to the date set for mediation, June 14, 2018, and the date for the close of non-expert discovery shall be modified such that non-expert discovery shall close on June 22, 2018. All other dates set by the Court remain unchanged.

IT IS SO ORDERED.

Dated: 6/7/2018



By: _____
Judge Edward M. Chen
UNITED STATES DISTRICT COURT JUDGE