| 1<br>2<br>3<br>4<br>5<br>6<br>7 | BARBARA J. PARKER, City Attorney - SBN 069722<br>OTIS McGEE, JR., Chief Assistant City Attorney - SBN 071885<br>JAMILAH A. JEFFERSON, Deputy City Attorney - SBN 219027<br>One Frank H. Ogawa Plaza, 6th Floor<br>Oakland, California 94612<br>Phone: (510) 238-7686, Fax: (510) 238-6500<br>Email: jjefferson@oaklandcityattorney.org<br>X040219/1840456<br>Attorneys for Defendants<br>CITY OF OAKLAND, OAKLAND FIRE DEPARTMENT<br>TERESA DELOACH REED, in her official and individual capacities |  |               |  |
|---------------------------------|---|--|---------------|--|
| 8                               | UNITED STATES DISTRICT COURT  |  |               |  |
| 9                               | NORTHERN DISTRICT OF CALIFORNIA   |  |               |  |
| 10                              | SAN FRANCISCO DIVISION  |  |               |  |
| 11                              |   |  |               |  |
| 12                              | JOSEPH TORRES,  | Case No. C-15-05075-JCS  |               |  |
| 13                              | Plaintiff,  | STIPULATION TO EXTEND<br>FILE DEFENDANTS' ANSW                   |               |  |
| 14                              | v.  | PLAINTIFF'S COMPLAINT  |               |  |
| 15                              | CITY OF OAKLAND, OAKLAND FIRE<br>DEPARTMENT, TERESA DELOACH REED,   |  |               |  |
| 16                              | in her official and individual capacities   |  |               |  |
| 17                              | Defendants.   | n  |               |  |
| 18                              | Defendants City of Oakland, Oakland Fire  | Department, and Teresa Deloach R                                 | eed requested |  |
| 19                              | an extension of time within which to file a responsive pleading to Plaintiff Joseph Torres'   |  |               |  |
| 20                              | Complaint. Counsel for the parties agreed that Defendants would file a responsive pleading no later   |  |               |  |
| 21                              | than January 26, 2016. Attached as Exhibit A is a true and correct copy of the parties' email   |  |               |  |
| 22                              | exchange memorializing the agreement.   |  | ×             |  |
| 23                              | Date: January 26, 2036 TES DISTRICT CO.   |  |               |  |
| 24                              | Dated: 1/27/16  | . PARKER, City Attorney<br>E, JR., Chief Assistant City Attorney | ,             |  |
| 25                              |   | JEFFERSON, Senior Deputy City                                    | Attorney      |  |
| 26                              |   | A. Jefferson<br>Defendants,                                      |               |  |
|                                 | THE ADDITION OF OAKLAND, et al.   |  |               |  |
|                                 |   | -1-  | C15-05075-JCS |  |

Dockets.Justia.com

## **EXHIBIT A**

.

## Jefferson, Jamilah

| From:    | Bryan Vereschagin <bryan@vereschaginlaw.com></bryan@vereschaginlaw.com>               |  |
|----------|---|--|
| Sent:    | Wednesday, January 06, 2016 4:07 PM   |  |
| То:      | Jefferson, Jamilah; Ferrel, Elizabeth   |  |
| Cc:      | X04219_Torres_ Joseph E_mail  |  |
| Subject: | RE: Joseph Torres vs. City of Oakland, et al.; C-15-05075-JCS; Request for a Two Week |  |
|          | Extension to January 26, 2016, to Respond to Complaint [IWOV-imanage.FID169692]       |  |

No problem. Thanks.

Bryan Vereschagin Vereschagin Law Firm P.C. 505 Montgomery Street, 11th Floor San Francisco, California 94111 Ph: 415-834-5434 Cell: 415-370-8380 bryan@vereschaginlaw.com

Sent from my Verizon Wireless 4G LTE smartphone ------ Original message -------From: "Jefferson, Jamilah" <<u>JJefferson@oaklandcityattorney.org</u>> Date: 1/6/2016 3:55 PM (GMT-08:00) To: Bryan Vereschagin <<u>bryan@vereschaginlaw.com</u>>, "Ferrel, Elizabeth" <<u>EFerrel@oaklandcityattorney.org</u>> Cc: X04219\_Torres\_Joseph E\_mail <<u>{F169692}.imanage@oca-svr-dms1.oca.oakland.local</u>> Subject: RE: Joseph Torres vs. City of Oakland, et al.; C-15-05075-JCS; Request for a Two Week Extension to January 26, 2016, to Respond to Complaint [IWOV-imanage.FID169692]

Great. Thank you very much. Safe travels.

From: Bryan Vereschagin [mailto:bryan@vereschaginlaw.com]
Sent: Wednesday, January 06, 2016 3:52 PM
To: Ferrel, Elizabeth
Cc: Jefferson, Jamilah; X04219\_Torres\_ Joseph E\_mail
Subject: RE: Joseph Torres vs. City of Oakland, et al.; C-15-05075-JCS; Request for a Two Week Extension to January 26, 2016, to Respond to Complaint [IWOV-imanage.FID169692]

Jamilah: No problem with the extension. I've been on the road for holidays or work much of the past week.

Best regards always,

Bryan Vereschagin

Vereschagin Law Firm P.C.

505 Montgomery Street, 11th Floor

San Francisco, California 94111

Ph: 415-834-5434

Cell: 415-370-8380

bryan@vereschaginlaw.com

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message ------

From: "Ferrel, Elizabeth" < EFerrel@oaklandcityattorney.org>

Date: 1/6/2016 2:26 PM (GMT-08:00)

To: bryan@vereschaginlaw.com

Cc: "Jefferson, Jamilah" <<u>JJefferson@oaklandcityattorney.org</u>>, X04219\_Torres\_ Joseph E\_mail <<u>{F169692}.imanage@oca-svr-dms1.oca.oakland.local</u>>

Subject: Joseph Torres vs. City of Oakland, et al.; C-15-05075-JCS; Request for a Two Week Extension to January 26, 2016, to Respond to Complaint [IWOV-imanage.FID169692]

Dear Mr. Vereschagin:

I hope this email finds you well. I am contacting you regarding the above-captioned matter in which our office represents the following Defendants: City of Oakland, the Oakland Fire Department and the Fire Chief, Teresa Deloach Reed. In light of the recent holidays and scheduling difficulties, our office is

requesting a two week extension within which to Respond to the Complaint served by your client, Joseph Torres on December 22, 2015. We are seeking an extension to January 26, 2016.

Otis McGee, Jr. from our office has made an attempt to contact you via telephone in regards to the extension as well. We thank you in advance for your attention to this matter.

Sincerely,

Jamilah A. Jefferson

Senior Deputy City Attorney

Oakland City Attorney's Office

1 Frank Ogawa Plaza, 6th Floor

Oakland, CA 94612

(510) 238-7686

This is a confidential attorney-client communication. This email contains confidential attorney-client privileged information and is for the sole use of the intended recipient(s). Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message and any attachments. [v1.3]