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5 Attorneys for Defendants
 6 CITY OF OAKLAND, OAKLAND FIRE DEPARTMENT
 TERESA DELOACH REED, in her official and individual capacities

7
 8 **UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**
 10 **SAN FRANCISCO DIVISION**

11 JOSEPH TORRES,

12 Plaintiff,

13 v.

14 CITY OF OAKLAND, OAKLAND FIRE
 15 DEPARTMENT, TERESA DELOACH REED,
 in her official and individual capacities

16 Defendants.
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Case No. C-15-05075-JCS

REQUEST AND STIPULATION TO
RESCHEDULE CASE MANAGEMENT
STATEMENT AND CASE
MANAGEMENT CONFERENCE DATES
IN COURT'S FEBRUARY 23, 2016 CASE
MANAGEMENT AND PRETRIAL
ORDER

21 Defendants have a scheduling conflict with certain days in the Court's February 23, 2016
 22 Case Management and Pretrial Order.

23 Specifically, Defendants seek to reschedule the Case Management Statement deadline from
 May 27, 2016
 24 May 13, 2016 to ~~May 19, 2017~~.

25 Further, Defendants seek to reschedule the Case Management Conference from May 20,
 June 3, 2016
 26 2016 to ~~May 27, 2017~~.

1 The parties have agreed to the proposed new dates. Attached as Exhibit A is a true and
2 correct copy of the parties' email exchange memorializing the agreement.

3 By and through this stipulation, the parties propose these new dates and request approval
4 from the Court.

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6 Date: February 29, 2016

BARBARA J. PARKER, City Attorney
OTIS McGEE, JR., Chief Assistant City Attorney
JAMILAH A. JEFFERSON, Senior Deputy City Attorney

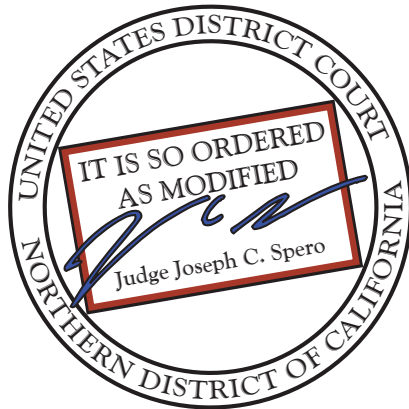
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9 By: /s/ Jamilah A. Jefferson
Attorneys for Defendants,
CITY OF OAKLAND, et al.

10
11
12 Date: February 29, 2016

VERESCHAGIN LAW FIRM P.C.
BRYAN W. VERESCHAGIN

13
14 By: /s/ Bryan W. Vereschagin
Attorney for Plaintiff,
JOSEPH TORRES

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18 Dated: 3/2/16



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**EXHIBIT
A**

Jefferson, Jamilah

From: Bryan Vereschagin <bryan@vereschaginlaw.com>
Sent: Friday, February 26, 2016 2:17 PM
To: Jefferson, Jamilah
Cc: {F169692}.imanage@oca-svr-dms1.oca.oakland.local
Subject: RE: Do you mind if we do initial disclosures next Friday?

Perfect. Have a good weekend.

Bryan Vereschagin
The Vereschagin Law Firm PC
505 Montgomery Street, 11th Floor
San Francisco, CA 94111
Ph: 415-834-5434
Fax: 800-846-3079
www.vereschaginlaw.com

From: Jefferson, Jamilah [mailto:JJefferson@oaklandcityattorney.org]
Sent: 02/26/2016 11:02 AM
To: Bryan Vereschagin
Cc: {F169692}.imanage@oca-svr-dms1.oca.oakland.local
Subject: RE: Do you mind if we do initial disclosures next Friday?

Ok. Sounds good. I will draft stip next week with your electronic signature. Hopefully the Court will approve.

From: Bryan Vereschagin [mailto:bryan@vereschaginlaw.com]
Sent: Friday, February 26, 2016 10:48 AM
To: Jefferson, Jamilah
Cc: {F169692}.imanage@oca-svr-dms1.oca.oakland.local
Subject: RE: Do you mind if we do initial disclosures next Friday?

Jamilah: Let's do May 19 for the statement and the 27th for the CMC.

Best always,

Bryan Vereschagin
The Vereschagin Law Firm PC
505 Montgomery Street, 11th Floor
San Francisco, CA 94111
Ph: 415-834-5434
Fax: 800-846-3079
www.vereschaginlaw.com

From: Jefferson, Jamilah [mailto:JJefferson@oaklandcityattorney.org]
Sent: 02/24/2016 12:41 PM
To: Bryan Vereschagin
Cc: {F169692}.imanage@oca-svr-dms1.oca.oakland.local
Subject: RE: Do you mind if we do initial disclosures next Friday?
Importance: High

Bryan,

I am proposing new dates for the next CMC statement and CMC hearing. Spero only hears CMCs on Friday and typically the CMC statement is due the week before.

Which set of dates work for you:

1. CMC statement Apr 29; CMC May 6
2. CMC statement May 19; CMC May 27
3. CMC statement June 1; CMC June 10

Let me know what you think.

Thanks.

Jamilah

From: Bryan Vereschagin [<mailto:bryan@vereschaginlaw.com>]
Sent: Thursday, February 18, 2016 2:36 PM
To: Jefferson, Jamilah
Cc: {F169692}.imanager@oca-svr-dms1.oca.oakland.local
Subject: RE: Do you mind if we do initial disclosures next Friday? [IWOV-imanager.FID169692]

Perfect.

Have a great day,

Bryan Vereschagin
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www.vereschaginlaw.com

From: Jefferson, Jamilah [<mailto:JJefferson@oaklandcityattorney.org>]
Sent: 02/18/2016 2:31 PM
To: Bryan Vereschagin
Cc: {F169692}.imanager@oca-svr-dms1.oca.oakland.local
Subject: RE: Do you mind if we do initial disclosures next Friday? [IWOV-imanager.FID169692]

Ok. I will figure out a few sets of dates and send them to you.

From: Bryan Vereschagin [<mailto:bryan@vereschaginlaw.com>]
Sent: Thursday, February 18, 2016 2:09 PM
To: Jefferson, Jamilah
Cc: {F169692}.imanager@oca-svr-dms1.oca.oakland.local
Subject: RE: Do you mind if we do initial disclosures next Friday? [IWOV-imanager.FID169692]

Jamilah: Thanks for agreeing to the extension. No issue continuing the next CMC, but I have a trial starting in June 20 that will go to trial based on present posturing, so any rescheduling best if last week of May or first few days of June.

Best always,

Bryan Vereschagin
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505 Montgomery Street, 11th Floor
San Francisco, CA 94111
Ph: 415-834-5434
Fax: 800-846-3079
www.vereschaginlaw.com

From: Jefferson, Jamilah [<mailto:JJefferson@oaklandcityattorney.org>]
Sent: 02/18/2016 1:11 PM
To: Bryan Vereschagin
Cc: X04219_Torres_Joseph E_mail <{F169692}.imanage@oca-svr-dms1.oca.oakland.local>
Subject: RE: Do you mind if we do initial disclosures next Friday? [IWOV-imanage.FID169692]

Bryan, No problem. We can extend initial disclosures to Feb 26.

Also, after reviewing the Court's order after our CMC last Friday, I hope we can stipulate to moving the next CMC statement date (5/13) and CMC hearing date (5/20). I have scheduled vacation those dates. I am open to new dates any other time in May other than 5/12 and Memorial day weekend. Let me know if you have any conflicts in May so I can send over a stip with some proposed dates sooner than later.

Thanks.

From: Bryan Vereschagin [<mailto:bryan@vereschaginlaw.com>]
Sent: Thursday, February 18, 2016 11:06 AM
To: Jefferson, Jamilah
Subject: Do you mind if we do initial disclosures next Friday?

Jamilah: I'm still getting documents together and was wondering if we can extend our initial disclosures to next Friday? Please advise if you have any issue with that.

Best regards always,

Bryan Vereschagin
The Vereschagin Law Firm PC
505 Montgomery Street, 11th Floor
San Francisco, CA 94111
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www.vereschaginlaw.com

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