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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
 EXTEND TIME FOR COMPLETION OF
 EARLY NEUTRAL EVALUATION**

21 The parties agreed to participate in Early Neutral Evaluation (“ENE”) at the Case
 22 Management Conference on February 12, 2016. The Court ordered the parties to ENE on February
 23 18, 2016. The parties have been assigned to Jonathan Allan Klein of Kelly, Hockel & Klein P.C.
 24 for case evaluation. Mr. Klein indicated that the parties have 90 days from the Court’s referral to
 25 ENE to complete the process. The parties tentatively agreed to sit for the ENE session on April 28,
 26 2016. The ENE statement is due on April 21, 2016. Attached as Exhibit A is a true and correct

1 copy of the Scheduling Letter from Mr. Klein.

2 The parties also agreed, however, that these dates give them insufficient time to complete
3 the limited discovery that the Court ordered completed prior to the ENE session. The parties and
4 Mr. Klein agreed that it might be beneficial to request an extension of time to complete the ENE
5 session. The parties agreed that completing the ENE session no later than **June 17, 2016** would be
6 reasonable.

7 By and through this stipulation, the parties seek to extend the time to complete the ENE
8 session, propose **June 17, 2016** as the new deadline, and request approval from the Court.

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10 Date: March 30, 2016

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

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

15
16 Date: March 30, 2016

VERESCHAGIN LAW FIRM P.C.
BRYAN W. VERESCHAGIN

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18 By: /s/ Bryan W. Vereschagin
Attorney for Plaintiff,
19 JOSEPH TORRES

20
21 Dated: 4/1/16



EXHIBIT A



KELLY, HOCKEL & KLEIN, P.C.
Attorneys at Law
44 Montgomery Street, Suite 1500
San Francisco, CA 94104

JONATHAN ALLAN KLEIN

March 21, 2016

VIA EMAIL TRANSMISSION

Bryan W. Vereschagin, Esq.
VERESCHAGIN LAW FIRM P.C.
505 Montgomery Street, 11th Floor
San Francisco, CA 94111

Jamilah A Jefferson, Esq.
Oakland City Attorney
1 Frank Ogawa Plaza, 6th Floor
Oakland, CA 94612

Re: *Torres v. City of Oakland*
Case No. C 15-05075 JCS ENE

Dear Counsel:

Thank you for speaking with me today. As we discussed, the ENE in this case has been scheduled for April 28, 2016, at 9:00 a.m. at my offices here in San Francisco. The parties are directed that Mr. Torres and Ms. Reed are required to be in attendance, but that they may also bring other witnesses or participants as they deem fit. I have reserved the entire day for the matter, although the length of the day is likely dependent upon each of you and your clients.

Written ENE statements, not to exceed 5 pages (if by letter) or 10 pages (if by pleading) must be *exchanged between the parties and delivered to me via email* by no later than April 21, 2016.

The Court's Orders provide that I provide at least four hours of my time complimentary to the parties. Should we go over the four hours, I will be happy to continue if the parties so desire; however, my time would be reimbursed at the rate of \$300/hour, equally split between the parties.



Re: *Torres v. City of Oakland*

March 21, 2016

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Again, I look forward to meeting both of you. I believe you will find this process useful, whether you proceed to hear my evaluation or whether we participate in a mediation session, or both.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Jonathan Klein', written in a cursive style with a long horizontal flourish extending to the right.

Jonathan Allan Klein

cc: Ms. Alice Fiel (via email -- Alice_Fiel@cand.uscourts.gov)