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9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA  
 11 OAKLAND DIVISION

13 SAN FRANCISCO BAYKEEPER, a non-profit  
 14 corporation,

15 Plaintiff,

16 v.

17 JAMES F. TAYLOR dba PINOLE RODEO  
 18 AUTO WRECKERS,

19 Defendant.

Civil No. 4:15-cv-05825-MEJ

THIRD REQUEST TO CONTINUE CASE  
 MANAGEMENT CONFERENCE AND  
 ASSOCIATED DEADLINES, AND TO  
 EXTEND TIME TO RESPOND TO  
 COMPLAINT; ~~PROPOSED~~ ORDER

(Federal Water Pollution Control Act, 33  
 U.S.C. § 1251 *et seq.*)

Honorable Maria-Elena James

28 THIRD REQUEST TO CONTINUE CMC & TO EXTEND TIME TO RESPOND TO COMPLAINT –  
 Civil No. 4:15-cv-05825-MEJ

1 WHEREAS, on December 18, 2015, Plaintiff San Francisco Baykeeper (“Plaintiff”) filed the  
2 above-entitled action;

3 WHEREAS, Defendant has chosen to proceed as a *pro se* litigant, and has not appeared in this  
4 action;

5 WHEREAS, Plaintiff and Defendant (collectively, the “Parties”) have been working together  
6 in good faith to reach a settlement agreement in this action;

7 WHEREAS, pursuant to a second request by Plaintiff (Dkt. 10), the Court set the initial Case  
8 Management Conference in this action for July 7, 2016 at 10:00 a.m., and continued other deadlines in  
9 the case (Dkt. 11);

10 WHEREAS, the Parties desire to continue informal negotiations in good faith, and anticipate  
11 reaching a final settlement in this action within the next eight (8) weeks;

12 WHEREAS, Plaintiff requests, upon the Court’s approval, to reschedule the Case Management  
13 Conference for August 18, 2016, at 10:00 a.m., or at such later date that is convenient for the Court, in  
14 order to give the Parties a chance to complete settlement negotiations without involving the resources  
15 of the Court;

16 WHEREAS, Plaintiff requests, upon the Court’s approval, to reschedule the deadline to file the  
17 Parties’ ADR certifications and stipulations to ADR process or notices of need for an ADR phone  
18 conference no later than one week before the Case Management Conference;

19 WHEREAS, Plaintiff requests, upon the Court’s approval, to reschedule the deadline to file the  
20 Parties’ Rule 26(f) Report and Joint Case Management Statement no later than one week before the  
21 Case Management Conference;

22 WHEREAS, Plaintiff requests, upon the Court’s approval, to reschedule the deadline to file the  
23 Parties’ initial disclosures or objections in their Rule 26(f) Report no later than one week before the  
24 Case Management Conference;

25 WHEREAS, pursuant to a second request filed by Plaintiff (Dkt. 10), the Court extended  
26 Defendant’s time to respond to the complaint to until July 11, 2016 (Dkt. 11);  
27

1           WHEREAS, the Parties desire to extend the time for Defendant to respond to the complaint  
2 until August 22, 2016;

3           WHEREAS, such an extension of time within which to answer or otherwise respond to the  
4 complaint will not alter the date of any event or any deadline already fixed by Court Order;

5           WHEREAS, Plaintiff requests, upon the Court's approval, to extend the time for Defendant to  
6 respond to the complaint to August 22, 2016, in order to give the Parties a chance to complete  
7 settlement negotiations;

8           WHEREFORE, Plaintiff respectfully requests the Court to approve and enter the Proposed  
9 Order below.

10 DATE: June 24, 2016

Respectfully Submitted,

/s/ Nicole C. Sasaki

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Nicole C. Sasaki  
Attorneys for Plaintiff  
SAN FRANCISCO BAYKEEPER

~~PROPOSED~~ ORDER

GOOD CAUSE APPEARING,

1. The Case Management Conference shall be continued to July 25, 2016  
at 10:00 a.m.
2. The Parties' ADR certifications and stipulations to ADR process or notices of need for an ADR phone conference shall be filed no later than one week before the Case Management Conference.
3. The Parties' Rule 26(f) Report and Joint Case Management Statement shall be filed no later than one week before the Case Management Conference.
4. The Parties' initial disclosures or objections in their Rule 26(f) Report shall be filed no later than one week before the Case Management Conference.
5. Defendant's time to respond to the complaint shall be extended to August 22, 2016.

IT IS SO ORDERED.

Date: June 24, 2016

NORTHERN DISTRICT OF CALIFORNIA



Honorable Maria-Elena James  
United States District Court