

1 Andrew H. Lee, State Bar No. 257403  
 LAW OFFICE OF ANDREW H. LEE  
 2 2021 The Alameda, Suite 310  
 San Jose, California 95126  
 3 Telephone: (408) 216-9898  
 Facsimile: (408) 216-9451

4 Attorney for Plaintiff

5 BRIAN J. STRETCH (CABN 163973)  
 6 Acting United States Attorney

7 SARA WINSLOW (DCBN 457643)  
 Chief, Civil Division

8 ANN MARIE REDING (CABN 226864)  
 9 Assistant United States Attorney

10 450 Golden Gate Avenue, Box 36055  
 San Francisco, California 94102-3495  
 11 Telephone: (415) 436-3618  
 FAX: (415) 436-6748  
 12 annie.reding@usdoj.gov

13 Attorneys for Defendant

14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA  
 16 SAN FRANCISCO DIVISION  
 17

18 MARCELINE F. MYLES,	)	Case No.: 3:16-cv-00239 JST
	)	
19 Plaintiff,	)	STIPULATION AND <del>PROPOSED</del> ORDER
	)	CONTINUING INITIAL CASE MANAGEMENT
20 v.	)	CONFERENCE
	)	
21 JACOB J. LEW, SECRETARY,	)	
DEPARTMENT OF TREASURY (U.S.	)	
22 MINT),	)	
	)	
23 Defendant.	)	

24  
 25  
 26  
 27  
 28

1  
2 Plaintiff Marceline F. Myles (“Plaintiff”) and Defendant Jacob J. Lew, Secretary, Department of  
3 Treasury (U.S. Mint) (“Defendant”), by and through their respective counsel, make the following  
4 representations and stipulate and agree as follows:

5 1. On January 14, 2016, Plaintiff filed his Complaint in this Court. *See* Docket No. 1. On  
6 January 14, 2016, the Court set this case for an April 13, 2016 initial case management conference. Dkt.  
7 No. 3.

8 2. On February 16, 2016, the U.S. Attorney’s Office was served with a copy of Plaintiff’s  
9 Complaint. Defendant’s responsive pleading is due to be filed on or before April 18, 2016.

10 3. In light of the fact that Defendant has not yet appeared in this action, and will not appear  
11 until April 18, 2016, the parties jointly request that the Court continue the initial case management  
12 conference and all related dates until June 1, 2016, or later.<sup>1</sup>

13 4. No prior extensions of time have been requested or granted.

14 5. The requested time modifications will have no impact on the schedule for this case except  
15 as outlined above.

16 DATED: March 28, 2016

Respectfully submitted,

17 /s/ Andrew H. Lee

18 ANDREW H. LEE  
Counsel for Plaintiff

19 DATED: March 28, 2016

Respectfully submitted,

20 BRIAN J. STRETCH  
Acting United States Attorney

21 /s/ Ann Marie Reding<sup>2</sup>

22 ANN MARIE REDING  
23 Assistant United States Attorney  
24 Attorneys for Defendant  
25

26 <sup>1</sup> Defendants anticipate filing a motion to dismiss in response to the complaint, and that motion is  
27 not likely to be heard until May 26, 2016. The parties are also agreeable to a case management  
conference that coincides with a hearing on Defendant’s motion.

28 <sup>2</sup> I, Ann Marie Reding, hereby attest that I obtained the concurrence in the filing of this  
document of all signatories whose signatures are represented by /s/.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**~~PROPOSED~~ ORDER**

Plaintiff and Defendant's Stipulation and Proposed Order Continuing Initial Case Management

Conference is hereby **GRANTED**. The initial case management conference set for April 13, 2016 is continued until ~~June 1, 2016~~ <sup>June 9, 2016</sup> at 2:00 p.m. A joint case management statement is due to be filed on ~~May 25, 2016~~ <sup>June 2, 2016</sup>.

Date: March 28, 2016

