

1 BRIAN J. STRETCH (CABN 163973)
 United States Attorney
 2 SARA WINSLOW (DCBN 457643)
 Chief, Civil Division
 3 WENDY M. GARBERS (CABN 213208)
 Assistant United States Attorney
 4
 450 Golden Gate Avenue, Box 36055
 5 San Francisco, California 94102-3495
 Telephone: (415) 436-6475
 6 FAX: (415) 436-7234
 wendy.garbers@usdoj.gov
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8 Attorneys for Defendants UNITED STATES
 OF AMERICA; DEPARTMENT OF HOMELAND
 SECURITY; and TRANSPORTATION
 9 SECURITY ADMINISTRATION

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION

13 SAI,)	Case No. 16-cv-01024-JST
14)	
15 Plaintiff,)	STIPULATION AND PROPOSED ORDER TO
16)	CONTINUE CMC
17 v.)	
18)	Current Date: September 13, 2017
19 DAVID SMITH, <i>et al.</i>)	Current Time: 2:00 p.m.
20)	
21 Defendants.)	

22 WHEREAS, the initial Case Management Conference (“CMC”) in this matter is currently set for
 23 September 13, 2017, at 2:00 p.m.;

24 WHEREAS, plaintiff Sai filed plaintiff’s Second Amended Complaint (“SAC”) on August 18,
 25 2017, and defendants’ responses are due on September 8, 2017;

26 WHEREAS, both the Federal Defendants and defendant Covenant Aviation Security, LLC
 27 (“Covenant”) intend to file a motion to dismiss in response to the SAC;

28 WHEREAS, defendants submit that it is premature to conduct a Rule 26(f) conference and
 proceed with discovery until the pleadings are settled;

1 IT IS HEREBY STIPULATED, by Plaintiff, the Federal Defendants, and Covenant that, subject to
2 Court approval, the September 13, 2017 CMC herein should be taken off calendar and reset to a time after
3 the pleadings are settled.

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5 DATED: August 30, 2017

Respectfully submitted,

6 BRIAN J. STRETCH
United States Attorney

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8 /s/ Wendy M. Garbers
WENDY M. GARBERS
Assistant United States Attorney

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10 Attorneys for Defendants UNITED
STATES OF AMERICA;
11 DEPARTMENT OF HOMELAND
SECURITY; and
12 TRANSPORTATION SECURITY
ADMINISTRATION

13 DATED: August 30, 2017

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15 CODDINGTON, HICKS & DANFORTH

16
17 /s/ Richard G. Grotch*
RICHARD D. GROTCH

18 Attorneys for Defendant
19 COVENANT AVIATION
SECURITY, LLC

20 DATED: August 30, 2017

21
22 PLAINTIFF SAI

23
24 /s/ Sai *
SAI
Plaintiff Pro Se

25 **In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of
26 perjury that all signatories have concurred in the filing of this document.*

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: August 30, 2017



HONORABLE JON S. GIGAR
United States District Judge

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