

ALEX G. TSE (CABN 152348)  
 United States Attorney  
 SARA WINSLOW (DCBN 457643)  
 Chief, Civil Division  
 WENDY M. GARBERS (CABN 213208)  
 Assistant United States Attorney  
  
 450 Golden Gate Avenue, Box 36055  
 San Francisco, California 94102-3495  
 Telephone: (415) 436-6475  
 FAX: (415) 436-7234  
 wendy.garbers@usdoj.gov

Attorneys for Defendant SECRETARY OF THE  
 DEPARTMENT OF HOMELAND SECURITY

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

SAI,  Plaintiff,  v.  COVENANT AVIATION SECURITY, LLC, et al.,  Defendants.	) No. 16-cv-01024 JST ) ) <b>STIPULATION AND <del>[PROPOSED]</del> ORDER RE</b> ) <b>STAY PENDING ADR AND FURTHER CMC</b> ) ) ) The Honorable Jon S. Tigar ) ) )
--	---

WHEREAS, this matter is currently stayed for all purposes other than ADR until January 2, 2019  
 (ECF 237);

WHEREAS, on December 13, 2018, the parties participated in an all-day settlement conference  
 with the assistance of Magistrate Judge Sallie Kim;

WHEREAS, at the December 13, 2018 settlement conference, plaintiff and defendant Covenant  
 Aviation Security, LLC, reached a settlement agreement, which they will reduce to writing;

WHEREAS, plaintiff and the government did not reach a settlement at the conference. They did,  
 however, agree to some further steps, which have the potential to ultimately result in a settlement;

WHEREAS, Judge Kim has agreed to further assist the parties with their ADR efforts and has

STIPULATION AND ~~[PROPOSED]~~ ORDER RE STAY PENDING ADR AND FURTHER CMC  
 No. 16-cv-01024 JST

1 scheduled a further telephone conference for January 29, 2019, at 9:00 a.m.;

2 WHEREAS, a further case management conference is currently scheduled herein for January 16,  
3 2019;

4 IT IS HEREBY STIPULATED, by Plaintiff Sai, Defendant Secretary of the Department of  
5 Homeland Security, and Defendant Covenant Aviation Security, LLC, that, subject to Court approval:

6 1. The stay previously entered in this matter continue sixty more days, until March 4, 2019, in order  
7 to accommodate the parties' settlement discussions; and

8 2. The further case management conference also be continued until after March 4, 2019.

9  
10 DATED: December 17, 2018

Respectfully submitted,

11 ALEX G. TSE  
12 United States Attorney

13 /s/ Wendy M. Garbers  
14 WENDY M. GARBERS  
15 Assistant United States Attorney

16 DATED: December 17, 2018

CODDINGTON, HICKS & DANFORTH

17  
18 /s/ Richard G. Grotch\*  
19 RICHARD G. GROTCHE

20 Attorneys for Defendant  
21 COVENANT AVIATION  
22 SECURITY, LLC

23 DATED: December 17, 2018

BAKER BOTTS LLP

24  
25 /s/ Navi Singh Dhillon \*  
26 NAVI SINGH DHILLON  
27 Attorneys for Plaintiff SAI

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

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**

PURSUANT TO STIPULATION, it is hereby ordered that they stay previously entered in this matter continue until March 4, 2019. The January 16, 2019 CMC herein is hereby continued until March 13, 2019 at 2:00, with statements due on March 6, 2019.

Dated: December 18, 2018

  
\_\_\_\_\_  
HONORABLE JON S. TIGAR  
United States District Judge