2 3 4 5 6 7	Rachel A. Mihai, State Bar No. 249716 rmihai@bremerwhyte.com Boyd C. Johnson, State Bar No. 305834 bjohnson@bremerwhyte.com BREMER WHYTE BROWN & O'MEARA LLP 20320 S.W. Birch Street Second Floor Newport Beach, California 92660 Telephone: (949) 221-1000 Facsimile: (949) 221-1000 Facsimile: (949) 221-1001 Attorneys for Defendants, CITY AND COUNTY OF SAN FRANCISCO, EVE ZEFF, KEVIN O'SHEA, ANDREW MARTINEZ, MICHAEL MOHN, and RUDY ZAMORA	JEFFREY L. BORNSTEIN, ESQ. ERNEST GALVAN, ESQ. BENJAMIN BIEN-KAHN, ESQ. Rosen Bien Galvan & Grunfeld 50 Fremont Street, 19th Floor San Francisco, California 94105-2235 Telephone: (415) 433-6830 Facsimile: (415) 433-7104 Email: jbornstein@rbgg.com egalvan@rbgg.com bbien-kahn@rbgg.com Attorneys for Plaintiffs FABIO PETROLINO; M.P., a minor, through her guardian ad litem, Ana Petrolino; ANDRELINA SILVA; ANGELA PETROLINO; and ALEX PETROLINO
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23	MITCHELL	
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28 BREMER WHYTE BROWN &	///	16 2046 DG
O'MEARA LLP 20320 S.W. BIRCH STREET SECOND FLOOR NEWPORT BCH, CA 92660	JOINT STIPULATION TO MODIFY CAS	<u>16-cv-2946-RS-</u> E MANAGEMENT SCHEDULING ORDER
(949) 221-1000		

16-cv-2946-RS-JCS

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1	UNITED STATES DISTRICT COURT			
2	NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION			
3				
4	FABIO PETROLINO, et al.,	Case No. 16-cv-2946-RS-JCS		
5	Plaintiffs,	JOINT STIPULATION TO CONTINUE THE TRIAL DATE AND AMEND CASE MANAGEMENT SCHEDULING ORDER		
6	V.			
7	CITY AND COUNTY OF SAN FRANCISCO, et al.	SCHEDULING OKDER		
8	Defendants.	Judge: Hon. Richard Seeborg		
9		Current Trial Date: February 26, 2018 Proposed New Trial Date: March 19, 2018		
10				
11	JOINT STIPULATION			
12	The Parties to the above-captioned action, through their respective counsel of			
13	record, hereby stipulate and agree to amend the Case Management Scheduling Order			
14	issued in this case as follows:			
15	WHEREAS, the Court entered a Case Management Scheduling Order in the above-			
16	entitled matter on September 16, 2016;			
17	WHEREAS, the Parties have diligently conducted discovery, including extensive			
18	oral and written discovery of at least fifteen oral depositions and thousands of produced			
19	documents, in order to prepare their cases and mutually understand the legal and factual			
20	issues in the case;			
21	WHEREAS, the Parties intend to engage in private mediation on October 16, 2017;			
22	WHEREAS, preparation for mediation will require substantial time and resources,			
23	thereby diverting attention and preparation from upcoming expert discovery deadlines;			
24	WHEREAS, the Parties have agreed and request that this Court modify the Case			
25	Management Scheduling Order to continue the initial expert disclosure deadline from			
26	October 13, 2017 to October 20, 2017, the non-expert discovery deadline from October 20,			
27	2017 to October 27, 2017, and the current trial date from February 26, 2018 to March 19,			
28		16-cv-2946-RS-JCS		
	JOINT STIPULATION TO MODIFY CAS	E MANAGEMENT SCHEDULING ORDER		

1	2018, as set forth in the accompanying Proposed Revised Case Management Scheduling		
2	Order.		
3	IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.		
4	BREMER WHYTE BROWN &	XAVIER BECERRA	
5	O'MEARA, LLP	Attorney General of California	
6		JOHN P. DEVINE	
7	/s/ Boyd C. Johnson <sup>1</sup>	Supervising Deputy Attorney General	
8	RACHEL A. MIHAI BOYD C. JOHNSON	<u>/s/ Rosailda Perez</u>	
9	Attorneys for Defendants City and County		
0	of San Francisco, Eve Zeff, Andrew Martinez, Kevin O'Shea, Michael Mohn,	ROSAILDA PEREZ	
1	and Rudy Zamora	Deputy Attorney General	
12		Attorneys for Defendant Off. D. Mitchell	
13	CITY ATTORNEY OF THE CITY AND COUNTY OF SAN FRANCISCO		
14		ROSEN BIEN GALVAN &	
15	/s/ Mark D. Lipton	GRUNFELD	
16	Attorney for Defendants City and County	/s/ Benjamin Bien-Kahn	
17	of San Francisco, Eve Zeff, Andrew Martinez, Kevin O'Shea, Michael Mohn,		
8	and Rudy Zamora	ERNEST GALVAN	
9	CORDON & DEES	JEFFREY L. BORNSTEIN	
20	GORDON & REES	BENJAMIN BIEN-KAHN CHRISTOPHER D. HU	
20	/s/ Kathleen M. Rhoads	Attorneys for Plaintiffs	
22	KATHLEEN M. RHOADS		
23	Attorneys for Defendants Nick Crispino,		
24	Laruen Erickson, Mary Lefevre and HealthRight 360		
25			
26 27	<sup>1</sup> I, Boyd C. Johnson, certify that I have the con Bien-Kahn, Rosailda Perez, and Kathleen M. F <u>/s/ Boyd C. Johnson</u>		
28		16-cv-2946-RS-JCS	
	JOINT STIPULATION TO MODIFY CASE	MANAGEMENT SCHEDULING ORDER	

1	PURSUANT TO STIPULATION, IT IS SO ORDERED.		
2	The initial expert disclosure deadline in this matter will be continued from October		
3	13, 2017 to October 20, 2017. The non-expert discovery deadline in this matter will be		
4	continued from October 20, 2017 to October 27, 2017. The trial date in this matter will be		
5	continued from February 26, 2018 to March 19, 2018.		
6	2.1.1.		
7	DATE: 10/6/17		
8	RICHARD SEEBORG United States District Judge		
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	[PROPOSED] ORDER TO MODIFY CASE MANAGEMENT SCHEDULING ORDER H:\1433\484\Disc\Joint Stipulation to Modify Case Management Scheduling Order FINAL.docx		