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 10 XEROX STATE & LOCAL SOLUTIONS, INC.

11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**

13 MICHELLE KELLY, an individual, on
 14 behalf of herself and those similarly
 15 situated,

16 Plaintiff,

17 v.

18 BAY AREA TOLL AUTHORITY;
 19 GOLDEN GATE BRIDGE, HIGHWAY
 20 AND TRANSPORTATION DISTRICT;
 21 XEROX STATE AND LOCAL
 22 SOLUTIONS, INC.; and DOES 1-100,

23 Defendants.

Case No. 3:16-cv-06837-RS

**STIPULATION AND ~~[PROPOSED]~~ ORDER
 TO FURTHER CONTINUE DATES IN THE
 COURT'S JANUARY 27, 2017 ORDER
 REQUIRING PARTIES TO MEET AND
 CONFER**

Action Filed: September 7, 2016
 Action Removed: November 28, 2016

STIPULATION AND REQUEST

Plaintiff Michelle Kelly ("Plaintiff") and Defendants XEROX STATE AND LOCAL SOLUTIONS, INC. ("Xerox"), BAY AREA TOLL AUTHORITY ("BATA") and GOLDEN GATE BRIDGE, HIGHWAY AND TRANSPORTATION DISTRICT ("the District") (collectively "Defendants") (collectively referred to as the "Parties") through their respective counsel hereby stipulate as follows:

WHEREAS, on January 18, 2017, Xerox filed a letter with the Court requesting guidance on a discovery dispute with Plaintiff;

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1 WHEREAS, on January 20, 2017, Plaintiff filed a letter with the Court in response;
2 WHEREAS, on January 27, 2017, the Court issued an Order Requiring Parties to Meet
3 and Confer over the items in the discovery letters (the “Order”);
4 WHEREAS, paragraph 2 of the Order requires the Parties to meet and confer and file a
5 joint supplemental letter reflecting the results of those efforts by February 8, 2017;
6 WHEREAS, on February 7, 2017, the Parties filed a Stipulation and Proposed Order
7 requesting to continue the deadline to file a joint supplemental letter to February 15, 2017;
8 WHEREAS, on February 7, 2017, the Court granted the Parties request to extend the
9 deadline to February 15, 2017;
10 WHEREAS, pursuant to the Order, the Parties met and conferred by telephone on January
11 30, 2017, February 2, 2017, February 6, 2017 and February 14, 2017, and by email on February
12 14, 2017 and February 15, 2017, over the items in Xerox’s and Plaintiff’s discovery letters;
13 WHEREAS, the Parties are continuing to meet and confer to discuss the items in their
14 discovery letters;
15 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties through
16 their respective attorneys of record that the deadline to file a joint supplemental letter reflecting
17 the results of the Parties’ meet and confer efforts be extended for two days to February 17, 2017.

19 DATED: February 15, 2017 LINDEMANN LAW FIRM, APC
20
21 /s/ Blake J. Lindemann
22 BLAKE J. LINDEMANN
23 Attorneys for Plaintiff
MICHELLE KELLY

24 DATED: February 15, 2017 LAFAYETTE & KUMAGAI LLP
25
26 /s/ Rebecca K. Kimura
27 REBECCA K. KIMURA
28 Attorney for Defendants
XEROX STATE AND LOCAL SOLUTIONS, INC.

1 DATED: February 15, 2017

HANSON BRIDGETT LLP

2
3 /s/ Samantha D. Wolff
4 SAMANTHA D. WOLFF
5 Attorney for Defendants GOLDEN GATE
6 BRIDGE, HIGHWAY AND TRANSPORTATION
7 DISTRICT AND BAY AREA TOLL AUTHORITY

8 **SIGNATURE ATTESTATION**

9 I hereby attest that I have obtained the concurrence of Blake Lindemann, counsel
10 for Plaintiff, and Samantha Wolff, counsel for Defendants Golden Gate Bridge, Highway
11 and Transportation District and Bay Area Toll Authority, for the filing of this
12 stipulation.

13 /s/ Rebecca K. Kimura

14 **ORDER**

15 Good cause appearing therefor and pursuant to the parties' stipulation, it is hereby
16 ORDERED that the deadline to propose a special master for appointment and the deadline to file
17 a joint supplemental letter reflecting the results of the Parties' meet and confer efforts be
18 extended for two days to February 17, 2017.

19 PURSUANT TO STIPULATION, IT IS SO ORDERED.

20 DATED: 2/16, 2017

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22 RICHARD SEEBORG
23 United States District Judge

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