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7 XEROX STATE & LOCAL SOLUTIONS, INC.

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

11 MICHELLE KELLY, an individual, on
12 behalf of herself and those similarly
13 situated,

13 Plaintiff,

14 v.

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

18 Defendants.

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

**FOURTH STIPULATION AND [PROPOSED]
ORDER TO 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

21 **STIPULATION AND REQUEST**

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

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

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, pursuant to the Order, the Parties met and conferred by telephone on January
7 30, 2017, February 2, 2017 and February 6, 2017 over the items in Xerox’s and Plaintiff’s
8 discovery letters;

9 WHEREAS, on February 7, 2017, the Parties filed a Stipulation and Proposed Order
10 requesting to continue the deadline to file a joint supplemental letter to February 15, 2017, which
11 the Court granted;

12 WHEREAS, the Parties continued to meet and confer on February 14, 2017, and by email
13 on February 14, 2017 and February 15, 2017 over the items in Xerox’s and Plaintiff’s discovery
14 letters;

15 WHEREAS, on February 15, 2017, the Parties did not conclude their meet and confer
16 efforts and requested another continuance of the deadline to file a joint supplemental letter to
17 February 17, 2017, which the Court granted;

18 WHEREAS, the Parties continued to meet and confer on February 17, 2017 but did not
19 concluded their efforts, and requested another continuance of the deadline to file a joint
20 supplemental letter to February 22, 2017, which the Court granted;

21 WHEREAS, on February 21, 2017, and February 22, 2017, the Parties continued to meet
22 and confer over the items in Xerox’s and Plaintiff’s discovery letters, but have not concluded
23 their efforts;

24 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties through
25 their respective attorneys of record that the deadline to file a joint supplemental letter reflecting
26 the results of the Parties’ meet and confer efforts be extended to February 24, 2017.

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DATED: February 22, 2017

LINDEMANN LAW FIRM, APC

/s/ Blake J. Lindemann
BLAKE J. LINDEMANN
Attorneys for Plaintiff
MICHELLE KELLY

DATED: February 22, 2017

LAFAYETTE & KUMAGAI LLP

/s/ Rebecca K. Kimura
REBECCA K. KIMURA
Attorney for Defendants
XEROX STATE AND LOCAL SOLUTIONS, INC.

DATED: February 22, 2017

HANSON BRIDGETT LLP

/s/ Samantha D. Wolff
SAMANTHA D. WOLFF
Attorney for Defendants GOLDEN GATE
BRIDGE, HIGHWAY AND TRANSPORTATION
DISTRICT AND BAY AREA TOLL AUTHORITY

SIGNATURE ATTESTATION

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

/s/ Rebecca K. Kimura

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ORDER

Good cause appearing therefor and pursuant to the parties' stipulation, it is hereby ORDERED that the deadline to propose a special master for appointment and the deadline to file a joint supplemental letter reflecting the results of the Parties' meet and confer efforts be extended to February 24, 2017.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 2/23, 2017



RICHARD SEEBORG
United States District Judge