

1 HARMEET K. DHILLON (SBN: 207873)
 harmeet@dhillonlaw.com
 2 KRISTA L. BAUGHMAN (SBN: 264600)
 kbaughman@dhillonlaw.com
 3 GREGORY R. MICHAEL (SBN: 306814)
 gmichael@dhillonlaw.com
 4 DHILLON LAW GROUP INC.
 5 177 Post Street, Suite 700
 San Francisco, California 94108
 6 Telephone: (415) 433-1700
 7 Facsimile: (415) 520-6593

8 Attorneys for Plaintiffs

BRYAN H. HECKENLIVELY (SBN 279140)
 bryan.heckenlively@mto.com
 JESLYN A. EVERITT (SBN 274701)
 jeslyn.everitt@mto.com
 ELIZABETH A. KIM (SBN 295277)
 elizabeth.kim@mto.com
 MUNGER, TOLLES & OLSON LLP
 560 Mission Street, Twenty-Seventh Floor
 San Francisco, California 94105-2907
 Telephone: (415) 512-4000
 Facsimile: (415) 512-4077

CHARLES F. ROBINSON (SBN 113197)
 charles.robinson@ucop.edu
 MARGARET L. WU (SBN 184167)
 margaret.wu@ucop.edu
 UNIVERSITY OF CALIFORNIA
 Office of the General Counsel
 1111 Franklin Street, 8th Floor
 Oakland, CA 94607-5200
 Telephone: (510) 987-9800
 Facsimile: (510) 987-9757

Attorneys for Defendants

15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17 YOUNG AMERICA'S FOUNDATION, a
 Tennessee nonprofit corporation; and
 18 BERKELEY COLLEGE REPUBLICANS, a
 student organization at the University of
 19 California, Berkeley,

20 Plaintiffs,

21 v.

22 JANET NAPOLITANO, in her official
 capacity as President of UC; NICHOLAS B.
 23 DIRKS, individually and in his official
 capacity as Chancellor of UC Berkeley;
 24 STEPHEN C. SUTTON, individually and in
 his official capacity as Interim Vice
 25 Chancellor of the Student Affairs Division of
 UC Berkeley; JOSEPH D. GREENWELL,
 26 individually and in his official capacity as
 Associate Vice Chancellor and Dean
 27 of Students of UC Berkeley; MARGO
 BENNETT, in her official capacity as Chief of
 28 Police of UC Police Department, at Berkeley;

Case No. 3:17-cv-02255-MMC

**STIPULATION AND ~~PROPOSED~~
 ORDER CONTINUING HEARING ON
 MOTION TO DISMISS AND RESETTING
 BRIEFING SCHEDULE, AND
 CONTINUING INITIAL CASE
 MANAGEMENT CONFERENCE AND
 RELATED DEADLINES**

Place: Courtroom 7, 19th Floor
 Judge: Maxine M. Chesney

1 ALEX YAO, individually and in his official
2 capacity as Operations Division Captain of UC
3 Police Department, at Berkeley; and LEROY
4 M. HARRIS, individually and in his official
5 capacity as Patrol Lieutenant of UC Police
6 Department, at Berkeley,

7 Defendants.

8 **STIPULATION AND [PROPOSED] ORDER**

9 In support of this Stipulation, the Parties state as follows:

10 WHEREAS, on April 27, 2017, Plaintiffs served the Complaint on Defendants;

11 WHEREAS, the Parties stipulated that Defendants' deadline to respond to the Complaint
12 should be set for June 28, 2017;

13 WHEREAS, on June 28, 2017, Defendants filed a motion to dismiss the Complaint,
14 scheduled to be heard on August 25, 2017, and setting Plaintiffs' deadline to file a response on
15 July 12, 2017, and Defendants' deadline to file a reply on July 19, 2017;

16 WHEREAS, Plaintiffs' counsel is unavailable to appear at the August 25, 2017 hearing on
17 Defendants' motion to dismiss, as she will be traveling out of state;

18 WHEREAS, the Parties stipulate to continue the hearing on Defendants' motion to
19 September 8, 2017, and to reset the briefing schedule whereby Plaintiffs' response is due on
20 August 11, 2017, and Defendants' reply is due on August 25, 2017.

21 WHEREAS, on June 29, 2017, the Court continued the Initial Case Management
22 Conference set for July 28, 2017, to September 29, 2017, along with corresponding deadlines to
23 meet and confer and file ADR Certifications by September 8, 2017, and to file a Rule 26(f) report,
24 complete initial disclosures, and file a case management statement by September 22, 2017;

25 WHEREAS, the September 4, 2017 Labor Day holiday falls on the week corresponding to
26 the Parties' deadline to meet and confer and file ADR Certifications;

27 WHEREAS, the Parties stipulate and respectfully request that the Court continue the Initial
28 Case Management conference by one week to October 6, 2017, along with all corresponding
deadlines.

1 NOW THEREFORE, in light of the personal schedules of counsel, and the intervening
 2 holidays, the parties therefore stipulate and respectfully request that the Court continue the
 3 August 25, 2017 hearing on Defendants' motion to dismiss by two weeks, reset the briefing
 4 schedule as set forth below, and continue the September 29, 2017 initial case management
 5 conference and related deadlines by one week.

6 IT IS HEREBY STIPULATED that, with the approval of the Court, the following schedule
 7 should govern the case:

DATE	EVENT
August 11, 2017	Plaintiffs' deadline to file response to Motion to Dismiss
August 25, 2017	Defendants' deadline to file reply to Plaintiffs' response
September 8, 2017	Hearing on Motion to Dismiss at 9:00 a.m.
September 15, 2017	Last day to meet and confer regarding Rule 26 initial disclosures, early settlement, ADR process selection, and discovery plan; File ADR Certification File either Stipulation to ADR Process or Notice of Need for ADR Phone Conference
September 29, 2017	Last day to file Rule 26(f) report, complete initial disclosures or state objection in Rule 26(f) report and file Case Management Statement
October 6, 2017	Initial Case Management Conference at 10:30 AM

19
 20 Respectfully submitted,

21 DATED: June 30, 2017

DHILLON LAW GROUP, INC.

23 By: /s/ Harmeet K. Dhillon

HARMEET K. DHILLON

24 Attorneys for Plaintiffs

1 DATED: June 30, 2017

MUNGER, TOLLES & OLSON LLP

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

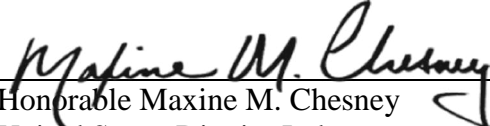
By: /s/ Bryan H. Heckenlively
BRYAN H. HECKENLIVELY
Attorneys for Defendants

PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED, with the following exceptions due to the Court's schedule:

1. The hearing on defendants' motion to dismiss is continued to September 29, 2017, at 9:00 a.m.
2. The Initial Case Management Conference is continued to October 27, 2017, and all related deadlines are continued in accordance therewith.

DATED: June 30 , 2017



Honorable Maxine M. Chesney
United States District Judge

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

ATTESTATION PURSUANT TO CIVIL L.R. 5-1(i)(3)

I, Bryan H. Heckenlively, am the ECF User whose ID and password are being used to file this document. I hereby attest that concurrence in the filing of this document has been obtained from the signatories.

/s/ Bryan H. Heckenlively

BRYAN H. HECKENLIVELY