

1 HARMEET K. DHILLON (SBN: 207873)

2 harmeet@dhillonlaw.com

3 KRISTA L. BAUGHMAN (SBN: 264600)

4 kbaughman@dhillonlaw.com

5 GREGORY R. MICHAEL (SBN: 306814)

6 gmichael@dhillonlaw.com

7 DHILLON LAW GROUP INC.

8 177 Post Street, Suite 700

9 San Francisco, California 94108

10 Telephone: (415) 433-1700

11 Facsimile: (415) 520-6593

12 Attorneys for Plaintiffs Young America's Foundation

13 and Berkeley College Republicans

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 YOUNG AMERICA'S FOUNDATION, et al.,

18 Plaintiffs,

19 v.

20 JANET NAPOLITANO, et al.,

21 Defendants.

Case Number: 3:17-cv-02255-MMC

Honorable Judge Maxine M. Chesney

**STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING PLAINTIFFS'
DEADLINE TO FILE FIRST
AMENDED COMPLAINT; SETTING
BRIEFING AND HEARING
SCHEDULE; AND CONTINUING
CASE MANAGEMENT
CONFERENCE**

Action Filed: April 24, 2017

Trial Date: Not Assigned

22 36847276.1

23 Stipulation and ~~PROPOSED~~ Order Continuing
24 Briefing Deadlines, Motion Hearing, and CMC

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

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

STIPULATION AND ~~PROPOSED~~ ORDER

In support of this Stipulation, the Parties stipulate and agree as follows:

WHEREAS, on April 24, 2017, Plaintiffs filed the Complaint against Defendants;

WHEREAS, on September 29, 2017, the Court held a hearing on Defendants’ motion to dismiss the Complaint, and granted the motion with leave to amend the Complaint (See Dkt. #27);

WHEREAS, the Court ordered that Plaintiffs shall file a First Amended Complaint (“FAC”) no later than October 27, 2017, and scheduled the Initial Case Management Conference for January 19, 2018 (Dkt. #25, 27);

WHEREAS, the Parties anticipate that Defendants will file a motion to dismiss the FAC;

WHEREAS, the Thanksgiving Day, Christmas Day, and New Year’s Day Court holidays fall during the default briefing and hearing schedule for the anticipated motion;

WHEREAS, counsel for Defendants has a previously scheduled arbitration hearing from March 19, 2017 through March 23, 2017;

WHEREAS, the following time modifications have been made in the case, whether by stipulation or Court order:

- the initial Case Management Conference has been continued from July 28, 2017 three times, and is currently set for January 19, 2018 (Dkt. #15, 17, 25);
- Defendants’ deadline to respond to the Complaint was continued from May 18, 2017 to June 28, 2017 (Dkt. #17);
- Plaintiffs’ deadline to file an opposition to Defendants’ motion to dismiss the Complaint was continued from July 12, 2017 to August 11, 2017 (Dkt. #17);
- Defendants’ deadline to file a reply in support of the motion to dismiss was continued from July 19, 2017 to August 25, 2017 (Dkt. #17);
- the hearing on Defendants’ motion to dismiss was continued from August 25, 2017 to September 29, 2017 (Dkt. #17);

WHEREAS, the Parties stipulate and respectfully request that the Court: continue Plaintiffs’ deadline to file the FAC by two weeks, to November 10, 2017; set the below briefing schedule for Defendants’ anticipated motion to dismiss the FAC; and continue the Initial Case Management

1 Conference and corresponding deadlines, as set forth below;

2 WHEREAS, the Parties do not believe the requested continuance will have any effect on the
3 overall schedule for this case;

4 NOW THEREFORE, in light of the intervening holidays and trial schedule for counsel, the
5 Parties stipulate and respectfully request that the following schedule govern the case:

DATE	EVENT
November 10, 2017	Plaintiffs' deadline to file First Amended Complaint
December 8, 2017	Defendants' deadline to file Motion to Dismiss
January 12, 2018	Plaintiffs' deadline to file response to Motion to Dismiss
January 26, 2018	Defendants' deadline to file reply to Plaintiffs' response
February 9, 2018	Hearing on Motion to Dismiss at 9:00 a.m.
March 9, 2018	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
March 23, 2018	Last day to file Rule 26(f) report, complete initial disclosures or state objection in Rule 26(f) report and file Case Management Statement
March 30, 2018	Initial Case Management Conference at 10:30 a.m.

22 Respectfully submitted,

23 Dated: October 25, 2017

DHILLON LAW GROUP INC.

24
25 By: /s/ Harmeet K. Dhillon

Harmeet K. Dhillon
Attorney for Plaintiffs

1 Dated: October 25, 2017

MUNGER, TOLLES & OLSON LLP

2
3 By: /s/ Bryan Heckenlively

4 Bryan Heckenlively
Attorney for Defendants

5
6 **DECLARATION**

7 Pursuant to Local Rule 6-2, I declare under penalty of perjury under the laws of the United
8 States that the foregoing is true and correct.

9
10 Dated: October 25, 2017

DHILLON LAW GROUP INC.

11 By: /s/ Harmeet K. Dhillon

12 Harmeet K. Dhillon
Attorney for Plaintiffs

13
14
15 **ATTESTATION PURSUANT TO CIVIL L.R. 5-1(i)(3)**

16 I, Harmeet K. Dhillon, am the ECF User whose ID and password are being used to file this
17 document. I hereby attest that concurrence in the filing of this document has been obtained from the
18 signatories.

19
20 Dated: October 25, 2017

DHILLON LAW GROUP INC.

21 By: /s/ Harmeet K. Dhillon

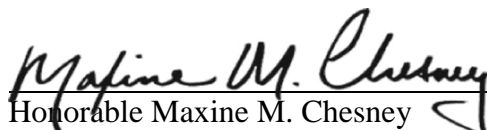
22 Harmeet K. Dhillon
23
24
25
26
27
28

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 SO ORDERED, with the exception that the hearing on any motion to dismiss will be held on February 16, 2018.

DATED: October 27, 2017


Honorable Maxine M. Chesney
United States District Judge