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10 Attorneys for Respondents/Defendants
 11 CITY OF PIEDMONT and
 CITY COUNCIL OF THE CITY OF PIEDMONT

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA

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 16 CROWN CASTLE NG WEST LLC, a
 17 Delaware limited liability company,

18 Petitioner/Plaintiff,

19 v.

20 CITY OF PIEDMONT, a California
 21 municipality; CITY COUNCIL OF THE
 CITY OF PIEDMONT, its governing body;
 22 AND DOES 1-10,

23 Respondents/Defendants.

Case No. 3:17-CV-06595 EMC

**STIPULATION TO CONTINUE
 RESPONSIVE PLEADING DEADLINE
 AND CASE MANAGEMENT
 CONFERENCE**

STIPULATION

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2 This Stipulation is entered into by and between Plaintiff CROWN CASTLE NG WEST
3 LLC (“Plaintiff”), by and through its attorneys, Newmeyer & Dillon LLP, and Defendants CITY
4 OF PIEDMONT and CITY COUNCIL OF THE CITY OF PIEDMONT (together, the “City”), by
5 and through its attorneys, Best Best & Krieger LLP:

6 Whereas, on December 8, 2018, the parties filed an initial stipulation whereby they agreed
7 to an extension of time for the City to respond to Plaintiff’s Complaint, to January 8, 2018;

8 Whereas, on January 22, 2018, pursuant to a stipulation of the parties, the Court referred
9 this matter to mediation, to be held no later than March 9, 2018, and extended the time for the
10 City to file a responsive pleading to March 9, 2018;

11 Whereas, on February 5, 2018, the parties participated in a telephone conference with the
12 assigned mediator, Margaret Corrigan, at which time all parties agreed to a mediation date of
13 March 23, 2018;

14 Whereas, on March 7, 2018, pursuant to a stipulation of the parties, the Court extended the
15 time for the City to file a responsive pleading to March 30, 2018 and set a case management
16 conference for April 19, 2018;

17 Whereas, on March 21, 2018, pursuant to a stipulation of the parties, the Court continued
18 the mediation completion date to April 12, 2018;

19 Whereas, on March 23, 2018, a mediation session between the parties was conducted, but
20 was not completed; the parties tentatively agreed to a further telephonic conference to continue
21 settlement discussions on April 6, 2018 at 2:00 p.m., with a further in-person mediation session to
22 be held thereafter pending the availability of the mediator and all parties;

23 Whereas, in anticipation of further mediation and in order to conserve both the Court’s
24 and both parties’ resources, the parties agree to continue the case management conference
25 currently scheduled for April 19, 2018 to May 17, 2018 or after, pending the availability of the
26 Court;

27 Whereas, pursuant to Local Rule 6-1(a), the parties agree to further extend the time in
28 which the City has to respond to Plaintiff’s Complaint herein by thirty (30) days, such that the

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SACRAMENTO, CA 95814

1 City's response to the Complaint will be due on or before **April 30, 2018**. As discussed above,
2 the parties previously stipulated to an initial 30-day extension, and two additional extensions of
3 60 and 21 days, respectively, to allow the parties to conduct mediation.

4 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the approval
5 of the Court:

6 The case management conference currently scheduled for April 19, 2018 at 9:30 a.m. shall
7 be continued to **May 17, 2018** or after, pending the availability of the Court; and

8 Pursuant to Local Rule 6-1(a), the City has an additional thirty (30) days to respond to
9 Plaintiff's Complaint herein, such that the City's response to the Complaint will be due on or
10 before **April 30, 2018**.

11 Dated: April 3, 2018

NEWMEYER & DILLON LLP

12 By: /s/ Michael W. Shonafelt

13 MICHAEL W. SHONAFELT
14 Attorneys for Petitioner/Plaintiff
15 CROWN CASTLE NG WEST LLC

16 Dated: April 3, 2018

BEST BEST & KRIEGER LLP

17 By: /s/ Harriet A. Steiner

18 HARRIET A. STEINER
19 DANA M. HOWARD
20 Attorneys for Respondents/Defendants
21 CITY OF PIEDMONT and CITY
22 COUNCIL OF THE CITY OF
23 PIEDMONT

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CROWN CASTLE NG WEST LLC, a
Delaware limited liability company,

Petitioner/Plaintiff,

v.

CITY OF PIEDMONT, a California
municipality; CITY COUNCIL OF THE
CITY OF PIEDMONT, its governing body;
AND DOES 1-10,

Respondents/Defendants.

Case No. 3:17-CV-06595 EMC

~~[PROPOSED]~~ ORDER RE
CONTINUANCE OF RESPONSIVE
PLEADING DEADLINE AND CASE
MANAGEMENT CONFERENCE

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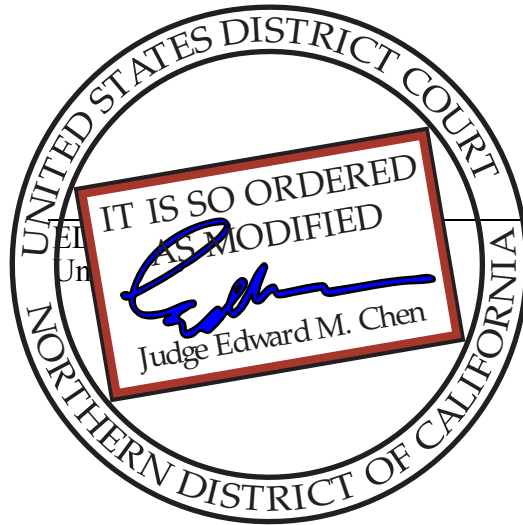
[PROPOSED] ORDER

Pursuant to the parties’ stipulation and good cause appearing therefor, IT IS HEREBY ORDERED as follows:

The case management conference currently scheduled for April 19, 2018 at 9:30 a.m. shall be continued to May 24, 2018 at 9:30 a.m.; and

Pursuant to Local Rule 6-1(a), the City has an additional thirty (30) days to respond to Plaintiff’s Complaint herein, such that the City’s response to the Complaint will be due on or before **April 30, 2018**.

Dated: 4/5, 2018



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