

1 LINDA M. ROSS (SBN 133874)  
 lross@publiclawgroup.com  
 2 GEOFFREY SPELLBERG (SBN 121079)  
 gspellberg@publiclawgroup.com  
 3 SPENCER J. WILSON (SBN 266938)  
 swilson@publiclawgroup.com  
 4 ANASTASIA BONDERCHUK (SBN 309091)  
 abonderchuk@publiclawgroup.com  
 5 RENNE PUBLIC LAW GROUP®  
 350 Sansome Street, Suite 300  
 6 San Francisco, CA 94104  
 Telephone: (415) 848-7200  
 7 Facsimile: (415) 848-7230

8 Attorneys for Defendant  
 CITY AND COUNTY OF SAN FRANCISCO

10 IN THE UNITED STATES DISTRICT COURT  
 11 FOR THE NORTHERN DISTRICT OF CALIFORNIA

12 TATYANA LITVINOVA, individually and on  
 13 behalf of all others similarly situated,

14 Plaintiff,

15 v.

16 CITY AND COUNTY OF  
 17 SAN FRANCISCO,

18 Defendant.

Case No. 3:18-CV-01494-RS

**STIPULATION REGARDING CASE  
 SCHEDULING AND FILING OF CROSS  
 MOTIONS FOR SUMMARY JUDGMENT;  
 ORDER AS MODIFIED BY THE COURT**

Complaint Filed: March 8, 2018  
 Trial Date: TBD

19 Pursuant to this Court’s direction at the November 18, 2021 Case Management Conference,  
 20 Defendant City and County of San Francisco (the “City”) and Plaintiffs Tatyana Litvinova, et al. hereby  
 21 submit the below stipulation and proposed order regarding case scheduling and filing of cross-motions  
 22 for summary judgment. The City and plaintiffs in the related case of *Kristen Silloway, et al. v. City and*  
 23 *County of San Francisco.*, N.D. Cal. Case No. 3:20-cv-07400-RS are concurrently filing an identical  
 24 stipulation and proposed order in that case.

25 The parties agree that all motions for summary judgment will be filed in accordance with a cross-  
 26 motion briefing schedule, defined below, so Defendant may file a single motion seeking summary  
 27 judgment in both cases. If Plaintiffs in this case and/or *Silloway* move for summary judgment, Defendant  
 28 should be permitted to file a consolidated opposition to those motions. Any brief or memorandum of

RENNE PUBLIC LAW GROUP®

1 points and authorities filed by the *Litvinova* plaintiffs in support, opposition, or reply to a motion shall be  
 2 subject to the page limitations of this Court’s Local Rules (25 pages for motions and opposition briefs  
 3 and 15 pages for reply briefs) unless the parties make a timely request in order to increase the page  
 4 limitation. Defendant City shall have an increased page limitation due to the fact Defendant will be  
 5 filing consolidated briefs addressing two cases. Defendant’s page limitations for summary judgment  
 6 briefing shall be 40 pages for motions and opposition briefs and 25 pages for any reply brief, unless the  
 7 parties make a timely request in order to increase the page limitation.

8           Additionally, pursuant to the Court’s direction to extend all court deadlines by 90 days, the parties  
 9 submit the below case schedule for approval by the Court. The Court will not approve any further  
 10 extensions of the non-expert discovery deadlines. Starting with the close of discovery, the case schedule  
 11 will be as follows:

12	Feb. 18, 2022	Close of non-expert discovery
13	Mar. 18, 2022	Deadline to designate expert witnesses, FRCP 26(a)(2)
14	Apr. 15, 2022	Deadline to designate supplemental and rebuttal experts, FRCP 26(a)(2)
15	May 6, 2022	Deadline to complete expert discovery, FRCP 26(b)(4)
16	May 26, 2022	Motions for summary judgment due
17	June 16, 2022	Summary judgment opposition briefs due
18	June 30, 2022	Summary judgment reply briefs due
19	July 14, 2022	Hearing on motions for summary judgment due
20	July 14, 2022	Deadline to hear all pretrial motions
21	Aug. 31, 2022	Final Pretrial Conference
22	Sep. 13, 2022	Trial

23  
 24           The Parties respectfully request that the Court approve the Parties’ above stipulation regarding  
 25 case scheduling and filing of cross-motions for summary judgment.  
 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

Dated: December 17, 2021

RENNE PUBLIC LAW GROUP®

By: /s/Spencer J. Wilson  
Spencer J. Wilson

Attorneys for Defendant  
CITY AND COUNTY OF SAN FRANCISCO

Dated: December 17, 2021

PROMETHEUS PARTNERS


By: /s/Eduardo G. Roy  
Eduardo G. Roy

Attorneys for Plaintiffs  
TATYANA LITVINOVA, et al.

**ORDER**

PURSUANT TO STIPULATION AND THIS COURT’S PRIOR DIRECTION, IT IS SO ORDERED.

Dated: December 17, 2021

  
\_\_\_\_\_  
RICHARD SEEBORG  
Chief United States District Judge