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1	DENNIS J. HERRERA, State Bar #139669 City Attorney	
2	JESSE C. SMITH, State Bar #122517 Chief Assistant City Attorney	
3	RONALD P. FLYNN, State Bar #184186 Chief Deputy City Attorney	
4	YVONNE R. MERÉ, State Bar #173594 Chief of Complex and Affirmative Litigation	
5	MOLLIE M. LEE, State Bar #251404 SARA J. EISENBERG, State Bar #269303	
6	Deputy City Attorneys City Hall, Room 234	
7	1 Dr. Carlton B. Goodlett Place San Francisco, California 94102-4602	
8	Telephone: (415) 554-4748 Facsimile: (415) 554-4715	
9	E-Mail: brittany.feitelberg@sfcityatty.org	
10	Attorneys for Plaintiff CITY AND COUNTY OF SAN FRANCISCO	
11	(See signature page for additional parties and counsel)	
12		
13	UNITED STATES DISTRICT COURT	
14	NORTHERN DISTRICT OF CALIFORNIA	
15	CITY AND COUNTY OF SAN FRANCISCO,	Case No. 3:18-cv-02068-JST
16	Plaintiff,	STIPULATION AND [PROPOSED] ORDER
17		
18	VS.	
19	JEFFERSON B. SESSIONS III, Attorney General of the United States, UNITED	
20	STATES DEPARTMENT OF JUSTICE, DOES 1-100,	
21	Defendants.	
22		
23	WHEREAS, the United States Attorney's office was served with the complaint in this action	
24	on April 19, 2018;	
25	WHEREAS, the defendants filed and served a notice of motion and motion to dismiss on	
26	June 18, 2018 (Dkt. 18);	
27	WHEREAS, plaintiff intends to file an amended complaint pursuant to Federal Rule of Civil	
28	Procedure 15(a) in response to defendants' motion to dismiss, but require additional time to prepare	
	Stipulation and [Proposed] Order	1 n:\affirm\li2018\181193\01285663.docx
	Case No. 3:18-cv-02068-JST	Dockets.Just

1	their amendment;
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WHEREAS defendants anticipate that they will require additional time to prepare a response to the First Amended Complaint due to pre-scheduled annual leave;

NOW THEREFORE, the parties hereby stipulate that: (i) defendants' motion to dismiss shall
be taken off calendar upon the filing of plaintiffs' First Amended Complaint, (ii) plaintiffs shall file a
First Amended Complaint no later than July 23, 2018, and (iii) defendants shall file a response to the
First Amended Complaint no later than September 27, 2018. The parties respectfully request that the
Court so order, subject to further stipulation or Court order.

9 Respectfully submitted,

10 Dated: June 27, 2018

11 **DENNIS J. HERRERA** City Attorney 12 JESSE C. SMITH **RONALD P. FLYNN** 13 YVONNE R. MERÉ MOLLIE M. LEE 14 SARA J. EISENBERG **Deputy City Attorneys** 15 By: <u>/s/ Sara J. Eisenberg</u> 16 SARA J. EISENBERG Deputy City Attorney 17

18 Attorneys for Plaintiff
CITY AND COUNTY OF
SAN FRANCISCO

CHAD A. READLER Acting Assistant Attorney General LESLEY R. FARBY Assistant Branch Director, Civil Division CESAR A. LOPEZ-MORALES Trial Attorney

By: <u>/s/ Cesar A. Lopez-Morales</u> CESAR A. LOPEZ MORALES Trial Attorney U.S. Department of Justice Civil Division, Federal Programs Branch 20 Massachusetts Ave. NW, Rm. 6216 Washington, DC 20530 Tel: (202) 305-8550 Fax: (202) 616-8460 Email: cesar.a.lopez-morales@usdoj.gov

Attorneys for Defendants JEFFERSON B. SESSIONS III and UNITED STATES DEPARTMENT OF JUSTICE

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

2018

26 Dated: June 28

United States District Judge

1	ATTESTATION OF SIGNATURES	
2	I, Sara J. Eisenberg, hereby attest, pursuant to Local Civil Rule 5-1(i)(3) of the Northern	
3	District of California, that concurrence in the filing of this document has been obtained from each	
4	signatory hereto.	
5		
6	<u>/s/ Sara J. Eisenberg</u> Sara J. Eisenberg	
7	Deputy City Attorney	
8	Attorneys for Plaintiff	
9	CITY AND COUNTY OF SAN FRANCISCO	
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	Stipulation and [Proposed] Order 3 n:\affirm\li2018\181193\01285663.docx Case No. 3:18-cv-02068-JST	