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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

LOS ANGELES TIMES  
 COMMUNICATIONS LLC, KQED, INC.,  
 SAN FRANCISCO PROGRESSIVE  
 MEDIA CENTER,

Plaintiffs,

v.

RALPH DIAZ, ACTING SECRETARY OF  
 THE CALIFORNIA DEPARTMENT OF  
 CORRECTIONS AND  
 REHABILITATION, RONALD DAVIS,  
 WARDEN OF THE CALIFORNIA STATE  
 PRISON AT SAN QUENTIN,

Defendants.

Case No. 3:18-cv-02146-RS

**STIPULATION AND [PROPOSED]  
 ORDER SCHEDULING CASE  
 MANAGEMENT CONFERENCE**

Courtroom: 3, 17th Floor  
 Judge: Hon. Richard Seeborg

Date Filed: April 11, 2018

Trial Date: Not Yet Set

1 Pursuant to Federal Rule of Civil Procedure 16 and Civil Local Rules 16 and 7-12,  
2 Plaintiffs Los Angeles Times Communications LLC; KQED, Inc.; and San Francisco Progressive  
3 Media Center, and Defendants Ralph Diaz and Ronald Davis, by and through their respective  
4 counsel, enter into the following stipulation requesting that the Court schedule a case  
5 management conference for February 14, 2019. The parties hereby stipulate as follows:

- 6 1. On April 11, 2018, Plaintiffs filed their Complaint in this action;
- 7 2. On May 3, 2018, Defendants responded to the Complaint by filing a Partial  
8 Motion to Dismiss;
- 9 3. On August 17, 2018, the Court issued an order denying Defendants' Partial  
10 Motion to Dismiss;
- 11 4. On August 31, 2018, Defendants filed an Answer to the Complaint;
- 12 5. The Court has not scheduled a case management conference or issued a scheduling  
13 order in this matter;
- 14 6. The parties agree that a case management conference would facilitate the efficient  
15 and expeditious litigation of this case;
- 16 7. On November 14, 2018, Plaintiffs requested that Defendants stipulate to a joint  
17 request asking the Court to schedule a case management conference in the above-entitled matter.
- 18 8. Defendants requested that a case management conference be set on a mutually  
19 agreeable date after the holiday season in late January or early February. Plaintiffs provided two  
20 dates, January 24, 2019 and February 14, 2019, and Defendants chose February 14, 2019.
- 21 9. The parties stipulate and jointly request that the Court schedule a case  
22 management conference in the above-captioned matter for February 14, 2019.

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24 **SO STIPULATED AND AGREED.**  
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Dated: December 18, 2018

KEKER, VAN NEST & PETERS LLP

By: /s/ Ajay S. Krishnan  
AJAY S. KRISHNAN  
Attorneys for Plaintiffs  
San Francisco Progressive Media Center

Dated: December 18, 2018

DAVID WRIGHT TREMAINE LLP

By: /s/ Thomas R. Burke  
THOMAS R. BURKE  
Attorneys for Plaintiffs KQED, Inc. and Los  
Angeles Times Communications LLC

Dated: December 17, 2018

By: /s/ Jay M. Goldman  
JAY M. GOLDMAN  
Supervising Deputy Attorney General  
Attorneys for Defendants Ralph Diaz and  
Ronald Davis

**ATTESTATION**

I, Ajay S. Krishnan, am the ECF user whose Login and Password authorized the filing of this document. Under Civil Local Rule 5-1(i)(3), I attest that the other above signatories have concurred in the filing of this document.

Dated: December 18, 2018

By: /s/ Ajay S. Krishnan  
AJAY S. KRISHNAN


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**[PROPOSED] ORDER**

The parties' stipulation having been considered, and good cause appearing therefor, a case management conference in this matter is scheduled for February 14, 2019 at 10:00 am

**IT IS SO ORDERED.**

Dated: 12/18/18

By:   
\_\_\_\_\_  
HON. RICHARD SEEBORG  
UNITED STATES DISTRICT COURT