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7 Attorneys for Tribal Defendants

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 JW GAMING DEVELOPMENT, LLC, A
11 CALIFORNIA LIMITED LIABILITY
12 COMPANY,

13 Plaintiff,

14 v.

15 ANGELA JAMES; LEONA L. WILLIAMS;
16 MICHAEL R. CANALES; MELISSA M.
17 CANALES; JOHN TANG; PINOLEVILLE
18 POMO NATION, A FEDERALLY-
19 RECOGNIZED INDIAN TRIBE;
20 PINOLEVILLE GAMING AUTHORITY;
21 PINOLEVILLE GAMING COMMISSION;
22 PINOLEVILLE BUSINESS
23 BOARD; PINOLEVILLE ECONOMIC
24 DEVELOPMENT, LLC; A CALIFORNIA
25 LIMITED LIABILITY COMPANY; LENORA
26 STEELE; KATHY STALLWORTH;
27 MICHELLE CAMPBELL; JULIAN J.
28 MALDONADO; DONALD WILLIAMS;
VERONICA TIMBERLAKE; CASSANDRA
STEELE; JASON EDWARD RUNNING
BEAR STEELE; ANDREW STEVENSON;
CANALES GROUP, LLC, A CALIFORNIA
LIMITED LIABILITY
COMPANY; LORI J. CANALES; KELLY L.
CANALES; AND DOES 1 THROUGH 20,

Defendants.

CASE NO. 3:18-cv-02669-WHO

**STIPULATION TO PERMIT TRIBAL
DEFENDANTS TO EXCEED PAGE
LIMITATION OF MEMORANDUM IN
OPPOSITION TO PLAINTIFF'S
MOTION FOR SUMMARY JUDGMENT
AND [~~PROPOSED~~] ORDER THEREON**

Courtroom 2, 17th Floor
Hon. William H. Orrick

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STIPULATION

Plaintiff and Tribal Defendants, by and through their undersigned counsel, hereby stipulate and agree as follows:

1. WHEREAS, Plaintiff filed its pending Motion for Summary Judgment (Dkt 191) (“MSJ”) with a 24-page memorandum seeking a summary judgment of over 16 million dollars against 11 separate individuals and four separate entities (“Tribal Defendants”), which omits a statement of issues and includes 17 single-spaced footnotes, 44 lines in length, 34 legal authorities, some 70 or more alleged material facts, and dozens of exhibits that are hundreds of pages in length;
2. WHEREAS, Tribal Defendants will be filing an opposition memorandum responding to all of the matters raised and omitted by Plaintiff in its MSJ, including extensive legal briefing and opposing facts and evidence, and a motion to strike and evidentiary objections that must be included in the opposition memorandum by Local Rule, as well as additional facts and law concerning one or more affirmative defenses.
3. WHEREAS, counsel for the Tribal Defendants believe they cannot adequately and meaningfully present all of this information in their anticipated memorandum in opposition to the MSJ in under 35 pages.
4. WHEREFORE, Plaintiff and Defendants have agreed that Tribal Defendants may file a memorandum supporting their opposition to the MSJ which exceeds the 25-page limitation by 10 pages, totaling 35 pages. In stipulating to this request, Plaintiff does not concede or otherwise take any position on any representations herein, including those representations in paragraph 1 hereof; Plaintiff merely stipulates to Tribal Defendants’ request to exceed the 25-page limitation by 10 pages.

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Dated: May 1, 2020

Fredericks, Peebles & Patterson LLP

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By: /s/ Gregory M. Narvaez

Gregory M. Narvaez
Attorneys for Plaintiff

Dated: May 1, 2020

Prometheus Partners L.L.P.

By: /s/ Eduardo G. Roy

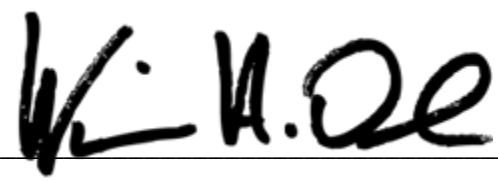
Eduardo G. Roy
Attorneys for Tribal Defendants

[PROPOSED] ORDER

Based on the foregoing stipulation of the parties, and good cause appearing therefor,
IT IS HEREBY ORDERED that Tribal Defendants may file a memorandum in opposition to
Plaintiff's pending Motion for Summary Judgment (Dkt 191) not to exceed 35 pages in length without
Court permission.

IT IS SO ORDERED.

Dated: May 5, 2020



JUDGE OF THE NORTHERN DISTRICT COURT