

1 Guy B. Wallace, State Bar No. 176151
 Mark T. Johnson, State Bar No. 76904
 2 SCHNEIDER WALLACE
 COTTRELL KONECKY LLP
 3 180 Montgomery Street, Suite 2000
 4 San Francisco, CA 94104
 Telephone: (415) 421-7100
 5 Facsimile: (415) 421-7105
 Email: gwallace@schneiderwallace.com
 6 mjohnson@schneiderwallace.com

7 James C. Sturdevant, State Bar No. 94551
 THE STURDEVANT LAW FIRM
 8 A Professional Corporation
 9 354 Pine Street, Fourth Floor
 San Francisco, CA 94104
 10 Telephone: (415) 477-2410
 Facsimile: (415) 477-2420
 11 Email: jsturdevant@sturdevantlaw.com

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13 Attorneys for Plaintiffs

14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**
 16 **OAKLAND DIVISION**

17
 18 IVANA KIROLA, *et al.*,
 19 Plaintiffs,
 20 vs.
 21 THE CITY AND COUNTY OF SAN
 FRANCISCO (“the CITY”), *et al.*;
 22
 23 Defendants.

No. 4:07-CV-03685 SBA
 CLASS ACTION
**STIPULATION ON REQUEST FOR
 EXTENSION OF TIME TO FILE JOINT
 STATEMENT RE FURTHER PROCEEDINGS;
~~PROPOSED~~ ORDER**

1 **STIPULATION**

2 WHEREAS, by its Order of March 20, 2014, (Dkt. No. 659 – “the Order), this Court
3 directed the parties to meet and confer and to file a joint statement regarding what, if any,
4 additional briefing, submission of evidence and/or further court proceedings are necessary and
5 appropriate for the final resolution of this action and to further meet and confer regarding potential,
6 further motion practice or supplemental briefing on specific issues;

7 WHEREAS, the Order required that the parties’ Joint Statement Re Further Proceedings
8 described above be filed by no later than April 11, 2014;

9 WHEREAS, the parties promptly engaged in the meet and confer process required by the
10 Order by engaging in comprehensive discussions on Friday, March 21 and Monday, March 22,
11 2014. During those discussions each side described its positions, to the extent they were then
12 developed, on each of the issues raised by the Order;

13 WHEREAS, following the meet and confer process, it was agreed by the parties that the
14 City would prepare an initial draft of the Joint Statement, including those sections setting forth its
15 positions that differed from Plaintiffs’ positions, after which Plaintiffs would review and add to the
16 draft;

17 WHEREAS, counsel for the City were not able to complete the preparation and internal
18 review of an initial draft of the Joint Stipulation until April 7, 2014 due, in part, to the need to
19 complete work on an appellate brief that was due on April 1, 2014 in the matter of *Anderson v.*
20 *City & County of San Francisco*, Cal. Court App., First Appellate Dist., Case No. A138856.

21 WHEREAS, Mark Johnson, one of the two attorneys for Plaintiffs involved in the meet and
22 confer process and the preparation Plaintiffs’ portion of the Joint Statement, will be out of the
23 office for personal reasons and unable to devote any time to this project for the period of April 9
24 through April 11, 2014;

25 WHEREAS, the parties anticipate that further meet and confer efforts may be appropriate
26 once a draft of the Joint Statement containing the positions of both parties has been prepared;
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1 WHEREAS, Plaintiffs have proposed, and Defendants do not oppose, a one week extension
2 of the deadline for filing the Joint Statement, to and including April 18, 2014;

3 THEREFORE, it is hereby stipulated, subject to the approval of the Court, that date by
4 which the Joint Statement Re: Further Proceedings be extended by one week, so that it is filed by
5 no later than April 18, 2014.

6 IT IS SO STIPULATED.

7 Dated: April 7, 2014

SCHNEIDER WALLACE
COTTRELL KONECKY LLP

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_____/s/_____
MARK JOHNSON
Counsel for Plaintiffs

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12 Dated: April 7, 2014

OFFICE OF THE CITY ATTORNEY

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_____/s/_____
JAMES M. EMERY
Counsel for Defendants

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ORDER

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Pursuant to the foregoing stipulation of the parties, IT IS HEREBY ORDERED that the
Joint Stipulation Re: Further Proceedings that is the subject of the Court's Order of March 20,
2014 (Dkt. No. 659), which was previously required to be filed by no later than April 11, 2014,
may be filed by no later than April 18, 2014.

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All other terms of the Court's Order of March 20, 2014 are unchanged.

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DATED: April 7, 2014

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SAUNDRA BROWN ARMSTRONG
United States District Judge

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