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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

GREGORY HALL, FAUSTO AGUILAR, )  
GONZALO AGUILAR, CHARLES )  
CHILTON, DOUGLAS GIVENS, ROBERT )  
IVY, QUINCY MOUTON, RICHARD )  
RANKIN, HECTOR RODRIGUEZ, LLOYD )  
THIBEAUX, ARNULFO CARRANZA- )  
RIVAS, ROY EDWARDS, TERRY )  
MACKEY, and DOUGLAS TURNER, )

Case No. 08-CV-3447 GW

Plaintiffs,

v.

APARTMENT INVESTMENT AND )  
MANAGEMENT COMPANY, AIMCO )  
CAPITAL, INC., FORTNEY & )  
WEYGANDT, INC., IMR CONTRACTOR )  
CORPORATION, BAY BUILDING )  
SERVICES, BAY AREA CONSTRUCTION )  
FRAMERS, INC., ALL HALLOWS )  
PRESERVATION, L.P., BAYVIEW )  
PRESERVATION, L.P., LA SALLE )  
PRESERVATION, L.P., SHOREVIEW )  
PRESERVATION, L.P., and DOES 1-50, )

Defendants.

**JOINT STIPULATION RE  
DISCOVERY DISPUTES IN  
NOVEMBER 29, 2010 JOINT  
LETTER OF PLAINTIFFS ROBERT  
IVY AND LLOYD THIBEAUX AND  
BAY AREA CONSTRUCTION  
FRAMERS**

The parties hereto, by their respective counsel, hereby stipulate and jointly request a Court order extending time to submit a joint letter brief regarding the discovery issues raised in their joint letter of November 29, 2010, as more fully set forth below. As grounds for this request, the parties hereto state as follows:

1. On November 29, 2010 the parties submitted a joint letter brief to the Court regarding outstanding discovery matters.

1 2. On December 16, 2010, the Court held a hearing with counsel for the parties to  
2 resolve these discovery issues. On that same date, the Court filed its Order as to the outstanding  
3 discovery issues.

4 3. On December 16, 2010, Plaintiffs' counsel Pamela Kong sought available dates from  
5 Defendant Bay Area Construction Framers' counsel Joseph Powell to inspect BACF's payroll  
6 systems and computers and to depose BACF employees Pat O'Neil and Russ Thorsted. On  
7 December 20, Mr. Powell responded that the best dates for the inspection and the depositions were  
8 during the week of January 10, 2010.

9 4. On December 28, 2010, Ms. Kong informed Mr. Powell that it was not feasible to  
10 conduct the inspection and the deposition in the same week. She also asked to conduct the  
11 inspection during the week before the depositions. That same day, Ms. Kong became ill and was  
12 unable to work again until January 3, 2010.

13 5. On December 29, 2010, Mr. Powell indicated that Ms. Kong could inspect the  
14 payroll systems and computers for only a few hours on January 5, 2011.

15 6. On January 3, 2010, Ms. Kong informed Mr. Powell that she would be going  
16 forward with an initial inspection on January 5 and suggested calendaring the depositions for  
17 January 13 and 14.

18 7. That same day, Mr. Powell responded that BACF was moving offices and that due to  
19 payroll demands, the inspection was not possible on January 5, 2011 but the deposition dates  
20 appeared fine. Mr. Powell also informed Ms. Kong that the earliest date that the inspection of the  
21 computer records could occur for certain was January 17, 2011.

22 8. Ms. Kong explained that she wanted to conduct the depositions after the inspection.  
23 Mr. Powell agreed.

24 WHEREFORE, the parties hereto respectfully request that the Court order as follows:

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JOINT STIPULATION FOR EXTENSION TO FILE JOINT LETTER BRIEF

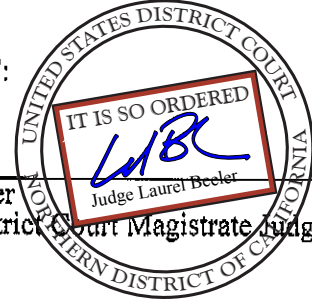
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1. The Court grant the parties until February 4, 2011 to submit a joint letter brief regarding the discovery issues set forth in its Order of December 16, 2011.

IT IS SO ORDERED.

Date: January 11, 2011


BY THE COURT:



Hon. Laurel Beeler  
United States District Court Magistrate Judge

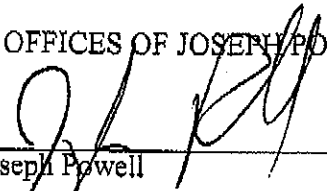
AGREED AND APPROVED:

SUNDEEN SALINAS & PYLE

By   
Robert Salinas  
Pamela Kong  
Jorge Aguilar

ATTORNEYS FOR PLAINTIFFS

LAW OFFICES OF JOSEPH POWELL

By   
Joseph Powell

ATTORNEYS FOR DEFENDANTS  
BAY AREA CONSTRUCTION FRAMERS