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8 Attorneys for Defendants
 CITY AND COUNTY OF SAN FRANCISCO, et al.

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA

13 FREDERICK SCHIFF,
 14 Plaintiff,
 15 vs.

16 THE CITY AND COUNTY OF SAN
 FRANCISCO; the SAN FRANCISCO
 17 POLICE DEPARTMENT; and HEATHER
 FONG, Individually and in her official
 18 Capacity as Chief of the SAN FRANCISCO
 POLICE DEPARTMENT,
 19 Defendant(s).

Case No. C08-4627 PJH
 Case No. C10-01051 PJH

**STIPULATED REQUEST FOR ORDER
 SHORTENING TIME TO HEAR
 DEFENDANTS' MOTION FOR PROTECTIVE
 ORDER AND PLAINTIFF'S 2ND MOTION TO
 COMPEL and [~~PROPOSED~~] ORDER**

[Civ. L.R. 6-2; 7-12]

Hearing Date: March 15, 2011
 Time: 9:00 A.M.
 Place: Court E, 15th Floor, SF
 Trial Date: None Set

23 Pursuant to Civil Local Rules 6-2 and 7-12, Defendants and Plaintiff submit the following
 24 stipulation and request for an Order shortening time to hear Defendants' Motion for Protective Order,
 25 filed February 4, 2011 and Plaintiff's 2nd Motion to Compel, also filed February 4, 2011. In the
 26 alternative, Defendants request that the court stay discovery related to the deposition of the City and
 27 County of San Francisco pending the outcome of its Motion for Protective Order.

1 On January 31, 2011 the court re-set the hearing schedule on Plaintiff's 1st Motion to Compel
2 and Plaintiff's Motion for Attorney's Fees and Costs to March 8, 2011 at 9:00 a.m. in Courtroom E,
3 15th Floor, United States District Court, 450 Golden Gate Avenue, San Francisco, California, 94102.
4 On this same date, Defendant City received an amended deposition notice from plaintiff, setting a Rule
5 30(b)(6) deposition for February 16, 2011.

6 Defendant served objections to plaintiff's deposition notice on February 1, 2011. Plaintiff
7 responded to defendant's request to meet and confer on February 3 and the parties were unable to come
8 to any agreement. Defendant is not only unavailable for deposition on February 16, but also seeks a
9 protective order regarding the Rule 30(b)(6) deposition notice, as well as certain categories of
10 information sought in discovery by plaintiff and subject of plaintiff's Motion to Compel set for hearing
11 March 8, 2011.

12 During its meet and confer, Plaintiff informed Defendant of his desire to file a 2nd Motion to
13 Compel. Defendants agreed that if the motion was filed by February 4, it would stipulate to it being
14 heard on the same shortened schedule as the City's Motion for Protective Order.

15 Defendant filed its Motion for Protective Order today, February 4, 2011. Plaintiff informed
16 Defendant in a second meet and confer phone conference held the morning of February 4, 2011 that he
17 would be filing his second Motion to Compel today. For sake of economy and efficiency, and due to
18 overlapping issues in both Plaintiff's two Motions to Compel and Defendant's Motion for Protective
19 Order, the parties respectfully request that their motions filed February 4, 2011 be heard on shortened
20 time, and on the same date set for plaintiff's 1st Motion to Compel: March 8, 2011. In addition, the
21 discovery cut off in both cases is set for March 18, 2011.

22 Moreover, plaintiff's counsel is located in Los Angeles and a consolidation of the hearing dates
23 for both motions would save opposing counsel an additional trip to San Francisco for an additional
24 hearing.

25 The parties met and conferred on February 3, 2011 and February 4, 2011 regarding this
26 Administrative Motion for Relief and defendant's request for a shortened briefing schedule. Both
27 parties agree and stipulate to the proposed shortened schedule.

1 The parties propose the following shortened hearing date and briefing schedule for the City's
2 Motion for Protective Order and Plaintiff's 2nd Motion to Compel filed February 4, 2011: Hearing on
3 Defendant's Motion for Protective Order and Plaintiff's 2nd Motion to Compel March 8, 2011;
4 Opposition briefs due February 16, 2011; and Reply briefs due February 23, 2011.

5 A stipulation and proposed order is included below.

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7 Dated: February 4, 2011

8 DENNIS J. HERRERA
9 City Attorney
10 ELIZABETH S. SALVESON
11 Chief Labor Attorney
12 JONATHAN C. ROLNICK

13 By: /s/ Lauren M. Monson
14 LAUREN M. MONSON
15 Attorneys for Defendant(s)
16 CITY AND COUNTY OF SAN FRANCISCO, et al.
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1 **IT IS STIPULATED BY THE PARTIES AS FOLLOWS:**

2 Defendant's Motion for Protective Order and Plaintiff's 2nd Motion to Compel, filed February
3 4, 2011, shall be heard on shortened time. Defendant's Motion for Protective Order and Plaintiff's 2nd
4 Motion to Compel will be heard on March 8, 2011 at 9:00 a.m. in Courtroom E, 15th Floor, United
5 States District Court, 450 Golden Gate Avenue, San Francisco, California, 94102. Opposition briefs
6 are due February 16, 2011 and Reply briefs are due February 23, 2011.

7
8 Dated: February 4, 2011

9
10 DENNIS J. HERRERA
City Attorney
11 ELIZABETH S. SALVESON
Chief Labor Attorney

12
13 By: /s/ Lauren M. Monson
LAUREN M. MONSON
14 Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO, et al.

15
16 Dated: February 4, 2011

17 By: /s/ Thomas K. Bourke
18 Thomas K. Bourke
Attorney for Plaintiff
19 FREDERICK SCHIFF

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21 **PURSUANT TO STIPULATION, AND AGREEMENT OF THE COURT, IT IS SO**
22 **ORDERED:**

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24 Dated: February 15, 2011

25
26 THE HONORABLE
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