

1 Michael R. Lozeau (State Bar No. 142893)  
 Richard T. Drury (State Bar No. 163559)  
 2 Douglas J. Chermak (State Bar No. 233382)  
 LOZEAU DRURY LLP  
 3 410 12<sup>th</sup> Street, Suite 250  
 Oakland, CA 94607  
 4 Tel: (510) 836-4200  
 Fax: (510) 836-4205 (fax)  
 5 E-mail: michael@lozeaudrury.com  
 doug@lozeaudrury.com  
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7 Attorneys for Plaintiffs  
 NORTHERN CALIFORNIA RIVER WATCH,  
 8 TEAMSTERS LOCAL 70, and EAST BAY  
 ALLIANCE FOR A SUSTAINABLE ECONOMY  
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10 **UNITED STATES DISTRICT COURT**  
 11 **NORTHERN DISTRICT OF CALIFORNIA**

12 NORTHERN CALIFORNIA RIVER WATCH,  
 a non-profit corporation; TEAMSTERS  
 13 LOCAL 70, a labor organization; and EAST  
 BAY ALLIANCE FOR SUSTAINABLE  
 14 ECONOMY, a non-profit organization,  
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16 Plaintiffs,  
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18 v.  
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OAKLAND MARITIME SUPPORT  
 20 SERVICES, INC., a corporation; WILLIAM  
 21 ABOUDI, an individual; and JORGE  
 GONZALEZ RIVERA d.b.a. CHRISTIAN  
 22 BROTHERS TRUCK SERVICES, an  
 individual; and REDEVELOPMENT AGENCY  
 OF THE CITY OF OAKLAND, a local public  
 agency;  
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24 Defendants.  
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Case No.: 4:10-cv-3912 CW-JSC

**STIPULATION REQUESTING A  
 SETTLEMENT CONFERENCE  
 BEFORE A MAGISTRATE JUDGE;  
 ORDER TO EXTEND DISCOVERY  
 DEADLINES AND TRIAL DATE**

Trial Date: June 3, 2013  
 Courtroom: 2, 4<sup>th</sup> Floor

Hon. Judge Claudia Wilken

26 WHEREAS, on June 12, 2012, pursuant to the parties' Stipulation and [Proposed] Order  
 27 to Extend Discovery Deadlines and Trial Date, the Court issued an order setting forth new  
 28 deadlines for discovery matters, a new pre-trial conference, and a new trial date;

WHEREAS, the parties have made several rounds of revisions to a draft settlement  
 agreement and have made significant progress in reaching an agreement in lieu of litigation;

1 WHEREAS, on September 28, 2012, the parties jointly filed a notice of need for ADR  
2 phone conference and believe that a settlement conference with a Magistrate Judge would greatly  
3 assist the parties to reach a settlement;

4 WHEREAS, the parties believe it would be in their mutual best interest to extend all  
5 deadlines and the trial date in this matter an additional three months in order to allow the parties  
6 to complete the settlement discussions and to the extent it becomes necessary, complete the  
7 ongoing discovery and;

8 WHEREAS, the parties believe that such an extension would conserve the resources of  
9 the court;

10 NOW THEREFORE, the parties hereby request that the Court assign this case to a  
11 Magistrate Judge for a settlement conference within the next 30-days, or as soon thereafter is  
12 convenient for the Court, and request that the Court establish the following new discovery  
13 deadlines, pre-trial conference date, and trial date:

<u>Deadline/Date</u>	<u>Date Set in 6/12/12 Order</u>	<u>New Date</u>
Date of Next CMC	2/7/13	5/9/13
Completion of fact discovery	1/18/13	4/19/13
Expert reports	10/19/12	1/18/13
Rebuttal	11/2/12	2/15/13
Complete Expert Discovery	12/4/12	3/15/13
Case-dispositive motions	2/7/13	5/8/13
Pre-trial conference	5/22/13	8/21/13
5-day trial	6/3/13	9/2/13

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26 Dated: October 10, 2012  
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*/s/ Michael R. Lozeau*

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MICHAEL R. LOZEAU  
Attorney for Plaintiffs

Dated: October 10, 2012

*/s/ Meredith E. Brown*

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(as authorized on 10/10/12)  
MEREDITH E. BROWN  
Attorney for Defendants  
OAKLAND MARITIME SUPPORT  
SERVICES, INC. and WILLIAM ABOUDI

Dated: October 10, 2012

*/s/ Robert Doty*

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(as authorized on 10/10/12)  
ROBERT DOTY  
Attorney for Defendant  
REDEVELOPMENT AGENCY OF THE  
CITY OF OAKLAND

**PURSUANT TO STIPULATION**, it is hereby ordered that:

1. This case shall be referred to a Magistrate Judge for a settlement conference to occur within 30 days.
2. The trial date and other case management dates are extended as set forth above in the Parties' stipulation, **except the case dispositive motions will be held on Thursday, May 9, 2013, and the 5-day jury trial will begin on Tuesday, September 3, 2013.**

**IT IS SO ORDERED.**

Dated: October 12, 2012

  
Hon. Claudia Wilken  
United States District Judge