

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

LAW OFFICES OF
WALKUP, MELODIA, KELLY & SCHOENBERGER
A PROFESSIONAL CORPORATION
650 CALIFORNIA STREET, 26TH FLOOR
SAN FRANCISCO, CALIFORNIA 94108-2615
(415) 981-7210

MATTHEW D. DAVIS (State Bar #141986)
ANDREW P. MCDEVITT (State Bar #271371)
ATTORNEYS FOR PLAINTIFFS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOSE GARCIA,

Plaintiff,

v.

CITY AND COUNTY OF SAN FRANCISCO,
RYAN JONES, and DOES ONE through
FIFTY,

Defendants.

Case No. CV 12-02443 SBA
(Assigned to Hon. Sandra B. Armstrong)

**PLAINTIFF AND DEFENDANT’S JOINT
STIPULATION AND [PROPOSED]
ORDER TO MODIFY INITIAL CASE
MANAGEMENT CONFERENCE AND
ADR DEADLINES**

Complaint Filed: March 16, 2012

This Stipulation is made by and between Plaintiff Jose Garcia and Defendants City and County of San Francisco and Ryan Jones, in reference to the following:

NOW, THEREFORE, the parties hereto stipulate and agree to and respectfully request the below modifications and/or amendments to this Court’s Order Setting Initial Case Management Conference and ADR Deadlines:

The parties contend there is good cause for this request for the following reasons:

1. Parties would like to explore the possibility of resolving this action without further litigation. The parties would like to use the next 45 days discussing resolution rather than discovery.
2. The request for continuance is made in good faith and not for delay.

- 1 3. The parties agree to and submit the following proposed modifications to the
2 scheduling order:
3 a. All deadlines will be postponed by at least forty-five (45) days;
4 b. That the deadline to file Rule 26(f) Report and file a Joint Case
5 Management Statement per Standing Order re Contents of Joint Case Management Statement be
6 moved from August 27, 2012 to October 17, 2012;
7 c. That the Initial Case Management Conference be moved from September 5,
8 2012 to October 24, 2012 at 2:30 p.m.;

9
10 Dated: August 27, 2012

RESPECTFULLY SUBMITTED,

WALKUP, MELODIA, KELLY & SCHOENBERGER

 /s/ Andrew P. McDevitt
ANDREW P. MCDEVITT
Attorney for Plaintiff

11
12
13
14
15
16 Dated: August 27, 2012

OFFICE OF THE CITY ATTORNEY

 /s/ Sean Connolly
SEAN CONNOLLY
Attorney for Defendants

17
18
19
20
21 ATTORNEY ATTESTATION

22 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
23 “conformed” signature (/s/) within this E-filed document.

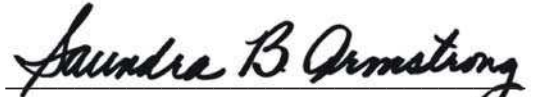
24 Dated: August 27, 2012

 /s/ Andrew P. McDevitt
ANDREW P. MCDEVITT

1 PURSUANT TO STIPULATION, IT IS SO ORDERED. The telephonic Case
2 Management Conference currently scheduled for September 5, 2012 is CONTINUED to **October**
3 **24, 2012 at 2:45 p.m.** Prior to the date scheduled for the conference, the parties shall meet and
4 confer and prepare a joint Case Management Conference Statement which complies with the
5 Standing Order for All Judges of the Northern District of California and the Standing Orders of
6 this Court. Plaintiff shall assume responsibility for filing the joint statement no less than seven (7)
7 days prior to the conference date. Plaintiff's counsel is to set up the conference call with all the
8 parties on the line and call chambers at (510) 637-3559. NO PARTY SHALL CONTACT
9 CHAMBERS DIRECTLY WITHOUT PRIOR AUTHORIZATION OF THE COURT. This
10 Order terminates Docket 13.

11 IT IS SO ORDERED.

12 Dated: August 28, 2012


SAUNDRA BROWN ARMSTRONG
United States District Judge