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5 Attorneys for Plaintiff  
 6 IVETTE RIVERA

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 8 **UNITED STATES DISTRICT COURT**  
 9 **NORTHERN DISTRICT OF CALIFORNIA**

12 IVETTE RIVERA,

13 Plaintiff,

14 v.

15 EAST BAY MUNICIPAL UTILITY  
 16 DISTRICT, et al,

17 Defendants.

Case No. C 15-00380

**STIPULATION AND ~~PROPOSED~~ ORDER  
 EXTENDING TIME FOR PLAINTIFF TO  
 FILE AN OPPOSITION TO MOTION TO  
 DISMISS SECOND AMENDED  
 COMPLAINT**

**DATE: FEBRUARY 10, 2016  
 TIME: 1:00 P.M.  
 COURTROOM 210**

**Hon. Sandra Brown Armstrong**

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1 PLEASE TAKE NOTICE that the parties to this action, Plaintiff IVETTE RIVERA and  
2 Defendant EAST BAY MUNICIPAL UTILITY DISTRICT (“EBMUD”), hereby stipulate to  
3 extend the time for Plaintiff to file an Opposition to Defendant’s Motion to Dismiss the Second  
4 Amended Complaint (Doc. No. 79) for a period of seven (7) days. Plaintiff’s Opposition is  
5 presently due on January 1, 2016. The parties have agreed to extend the time for Plaintiff’s  
6 Opposition until January 8, 2016, with the Reply extended an equal amount of time.

7 There exists good cause in which to grant this stipulation as (1) Defendant EBMUD filed  
8 a Motion to Dismiss Plaintiff’s Second Amended Complaint on December 18, 2015, with  
9 Opposition due on January 1, 2016, (2) during the meet and confer process prior to filing the  
10 motion, the parties stipulated to allow Plaintiff an additional seven days to file an Opposition to  
11 the motion, as Plaintiff’s counsel will be unavailable during the Christmas week, with family in  
12 town from Canada for the holiday, and (3) the extension of time should not interfere with the  
13 Court’s docket, as the hearing date is not scheduled until February 10, 2016.

14 The parties are not making this request for the purpose of any undue delay, and no party  
15 would suffer any prejudice if this stipulation was granted.

16 IT IS HEREBY STIPULATED between the parties that Plaintiff be provided with an  
17 extension of time of seven days until January 8, 2016 in which to file an Opposition to  
18 Defendant’s Motion to Dismiss the Second Amended Complaint.

19 SO STIPULATED.

20 Dated: December 18, 2015

LIEBERT CASSIDY WHITMORE

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22 //s// Zachary Shine  
ZACHARY SHINE  
Attorneys for Defendant EBMUD

23  
24 Dated: December 18, 2015

BROWN | POORE LLP

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26 //s// David M. Poore  
DAVID M. POORE  
Attorneys for Plaintiff IVETTE RIVERA

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**CIVIL LOCAL RULE 5-1(i)(3) ATTESTATION**

I hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories to this document.

DATED: December 18, 2015

By:           /s/David M. Poore          

DAVID M. POORE  
Attorney for Plaintiff

**PROPOSED ORDER**

GOOD CAUSE SHOWING, the Stipulation is GRANTED.

IT IS HEREBY ORDERED that the deadline for Plaintiff to submit her Opposition to Defendant’s Motion to Dismiss the Second Amended Complaint is extended until January 8, 2016. The deadline to file a Reply shall be extended equally.

SO ORDERED.

Dated: December 21, 2015

          *Sandra B. Armstrong*            
UNITED STATES DISTRICT COURT