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8 [REMAINING PARTIES ON SIGNATURE PAGE]

9  
 10 IN THE UNITED STATES DISTRICT COURT  
 11 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 12 OAKLAND DIVISION

13  
 14 EROTIC SERVICE PROVIDER LEGAL  
 EDUCATION & RESEARCH PROJECT;  
 15 K.L.E.S.; C.V.; J.B.; AND JOHN DOE,

16  
17 Plaintiffs,

18 v.

19 GEORGE GASCON, in his official capacity as  
 District Attorney of the City and County of San  
 Francisco; EDWARD S. BERBERIAN, JR., in  
 20 his official capacity as District Attorney of the  
 County of Marin; NANCY E. O'MALLEY, in  
 21 her official capacity as District Attorney of the  
 County of Alameda; JILL RAVITCH, in her  
 22 official capacity as District Attorney of the  
 County of Sonoma; and KAMALA D.  
 23 HARRIS, in her official capacity as Attorney  
 24 General of the State of California,

25 Defendants.

Case No.: 4:15-CV-01007 JSW

**STIPULATION AND [PROPOSED]  
 ORDER VACATING THE CASE  
 MANAGEMENT CONFERENCE SET  
 FOR JUNE 12, 2015 AND SETTING A  
 BRIEFING AND HEARING SCHEDULE  
 ON MOTION TO DISMISS UNDER  
 FEDERAL RULE OF CIVIL  
 PROCEDURE 12(b)(6).  
 AS MODIFIED**

Judge: The Hon. Jeffrey S. White  
 Dept: 5, 2d Floor  
 Trial Date: None Set  
 CMC Date: June 12, 2015  
 Action Filed: March 4, 2015

1 Pursuant to Civil Local Rules 6-1(b), 6-2 and 7-12, the Parties submit and stipulate to the  
2 following:

3 WHEREAS, on March 4, 2015, Plaintiffs filed the operative complaint (“Complaint”) in  
4 this matter;

5 WHEREAS, on March 5, 2015, the Court set the Case Management Conference  
6 (“CMC”) in this matter for June 12, 2015, with a joint case management statement due on June  
7 7, 2015;

8 WHEREAS, on March 13, 2015 and March 24, 2015, Plaintiffs sent notices of the  
9 lawsuit and requests to waive service to the Defendants, as described in the Declaration of  
10 Sharon L. O’Grady, filed herewith (“O’Grady Declaration” or “¶”), ¶¶ 3-4;

11 WHEREAS, Defendants intend to file a motion to dismiss the complaint in this action  
12 pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure (*id.* ¶ 5);

13 WHEREAS, on March 30, 2015, the Parties met and conferred telephonically to discuss  
14 waiver of service and a mutually acceptable briefing and hearing schedule on Defendant’s  
15 motion to dismiss the complaint, and a continuance of the CMC to allow the motion to be heard  
16 first (*id.* ¶ 5);

17 WHEREAS, the Parties continued to meet and confer via electronic mail up and through  
18 April 13, 2015, to confirm a briefing and hearing schedule for the motion to dismiss, and  
19 consistent with the Court’s calendar (*see id.* ¶ 6);

20 NOW, THEREFORE, the Parties hereby stipulate, and request that the Court order, as  
21 follows:

- 22 1. The Court shall vacate the June 12, 2015 CMC and all corresponding deadlines and  
23 filings;
- 24 2. Defendants’ motion(s) to dismiss shall be filed no later than May 8, 2015;
- 25 3. Plaintiffs’ opposition to the motion(s) to dismiss shall be filed no later than June 8,  
26 2015;
- 27 4. Defendants’ reply shall be due June 23, 2015; and

1 5. The hearing in this matter for the Court to address and hear the Parties' briefing shall  
2 be set for ~~July 31~~<sup>August 7</sup>, 2015, at 9:00 a.m. PT.

3 **CONCLUSION**

4 For the reasons set forth above, the Parties request that the Court vacate the current Case  
5 Management Conference set for June 12, 2015, and approve the above mentioned briefing  
6 schedule.

7  
8 DATED: April 17, 2015 Respectfully Submitted,

9 KAMALA D. HARRIS  
10 Attorney General of California  
11 TAMAR PACHTER  
12 Supervising Deputy Attorney General

13 By: /s/ \_\_\_\_\_  
14 SHARON L. O'GRADY  
15 Deputy Attorney General  
16 *Attorneys for Defendant Kamala D. Harris*

17 DATED: April 17, 2015 DONNA R. ZIEGLER,  
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29 DATED: April 17, 2015 DENNIS HERRERA  
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31 By: /s/ \_\_\_\_\_  
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6 DATED: April 17, 2015

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14 DATED: April 17, 2015

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22 DATED: April 17, 2015

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*Attorneys for Plaintiffs*

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: April 20, 2015

  
\_\_\_\_\_  
The Honorable Jeffrey S. White  
United States District Court Judge

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