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 THE RELATED COMPANIES, INC.,
 8 THIRD AND MISSION ASSOCIATES, LLC,
 and RELATED MANAGEMENT COMPANY, L.P.
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10 UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

11 PETER HOLLAND and KRISTEN
 12 HOLLAND,
 13 Plaintiffs,
 14 v.
 15 THE RELATED COMPANIES, INC.;
 16 THIRD AND MISSION ASSOCIATES,
 17 LLC; RELATED MANAGEMENT
 COMPANY, L.P.; DOES 1 through 10,
 18 inclusive
 Defendants.

Case No. 4:15-CV-03220 JSW
 Hon. Judge Jeffery S. White

**STIPULATION AND ~~PROPOSED~~
 ORDER CONTINUING DEADLINES SET
 IN APRIL 29, 2016 ORDER
 (DKT. NO. 65)
 AS MODIFIED**

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP
 101 CALIFORNIA STREET, SUITE 2300
 SAN FRANCISCO, CALIFORNIA 94111

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1 By and through their attorneys of record, Defendants THE RELATED COMPANIES,
2 INC., THIRD AND MISSION ASSOCIATES, LLC, and RELATED MANAGEMENT
3 COMPANY, L.P. (collectively, “Defendants”) and Plaintiffs PETER HOLLAND and KRISTIN
4 HOLLAND (“Plaintiffs”) hereby stipulate and agree as follows:

5 WHEREAS, the Court entered an order on April 29, 2016 (Dkt. No. 65), setting case
6 deadlines pursuant to stipulation of the parties;

7 WHEREAS, the current schedule is as follows:

| | |
|-----------------------------------|---------------------------------|
| 8 Fact discovery cut-off | May 23, 2016 |
| 9 Designation of experts | May 23, 2016 |
| 10 Expert discovery cut-off | June 20, 2016 |
| 11 Hearing of dispositive motions | July 8, 2016 |
| 12 Pretrial conference | September 26, 2016 at 2:00 p.m. |
| 13 Jury selection | October 26, 2016 at 8:00 a.m. |
| 14 Trial | October 31, 2016 at 8:00 a.m. |

15 WHEREAS, Defendants’ counsel and Plaintiffs’ counsel have met and conferred, and
16 agree that extension of certain of the deadlines in the current scheduling order is warranted.

17 IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto and
18 their respective undersigned attorneys, as follows:

19 The parties respectfully jointly request that the Court continue the deadlines set forth in the
20 April 29, 2016 Order as follows:

| | |
|-----------------------------------|---------------------------|
| 21 Fact discovery cut-off | May 27, 2016 ¹ |
| 22 Designation of experts | June 22, 2016 |
| 23 Expert discovery cut-off | July 15, 2016 |
| 24 Hearing of dispositive motions | July 22, 2016 |

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27 ¹ Thereby extending the deadline to file discovery motions to June 3, 2016, pursuant to Local Rule
28 37-3.

1 The parties propose no change to the other deadlines.

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3 IT IS SO STIPULATED.

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Respectfully submitted,

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7 DATED: May 27, 2016

/s/ Lyn R. Agre

Lyn R. Agre

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KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP

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Attorneys for Defendants

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THE RELATED COMPANIES, INC.,

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THIRD AND MISSION ASSOCIATES, LLC, and
RELATED MANAGEMENT COMPANY, L.P.

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13 DATED: May 27, 2016

/s/ Celia McGuinness

Paul L. Rein

14

Celia McGuinness

15

LAW OFFICES OF PAUL L. REIN

16

Steven L. Derby

17

THE DERBY LAW FIRM P.C.

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Attorneys for Plaintiffs

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PETER HOLLAND and

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KRISTEN HOLLAND

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CERTIFICATION OF COMPLIANCE WITH L.R. 5-1(i)(3)

Pursuant to Local Rule 5-1(i)(3), I hereby certify that the content of this document is acceptable to Celia McGuinness and Steven L. Derby, counsel for Plaintiffs, and that I have obtained their authorization to affix their respective electronic signatures to this document.

DATED: May 27, 2016

/s/ Lyn R. Agre
Lyn R. Agre
KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

Attorneys for Defendants
THE RELATED COMPANIES, INC.,
THIRD AND MISSION ASSOCIATES, LLC, and
RELATED MANAGEMENT COMPANY, L.P.

PROPOSED ORDER

Pursuant to the parties' stipulation, it is hereby ordered that the following deadlines set forth in the April 29, 2016 Order are vacated and reset as follows:

| | |
|--------------------------------|---------------------------------|
| Fact discovery cut-off | May 27, 2016 |
| Designation of experts | June 22, 2016 |
| Expert discovery cut-off | July 15, 2016 |
| Hearing of dispositive motions | July 22, 2016 |
| Pretrial conference | September 26, 2016 at 2:00 p.m. |
| Jury selection | October 26, 2016 at 8:00 a.m. |
| Trial | October 31, 2016 at 8:00 a.m. |

IT IS SO ORDERED. The parties shall review this Court's deadlines relating to pre-trial conferences, including the deadlines by which they must exchange motions in limine. The Court reserves the right to continue the pretrial conference and trial if required.

DATED: May 31, 2016

Honorable Jeffery S. White

