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 9 SAN FRANCISCO BAYKEEPER

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 OAKLAND DIVISION

13 SAN FRANCISCO BAYKEEPER, a non-profit
 14 corporation,

15 Plaintiff,

16 v.

17 GRANITE ROCK COMPANY, a California
 18 corporation,

19 Defendant.

Civil No. 4:16-cv-01089-KAW

20 STIPULATION TO CONTINUE CASE
 21 MANAGEMENT CONFERENCE AND
 22 ASSOCIATED DEADLINES; ~~PROPOSED~~
 23 ORDER

(Federal Water Pollution Control Act, 33
 U.S.C. § 1251 *et seq.*)

Honorable Kandis A. Westmore

1 Plaintiff San Francisco Baykeeper (“Baykeeper” or “Plaintiff”) and Defendant Granite Rock
2 Company (“Granite Rock” or “Defendant”) respectfully submit this stipulation as follows:

3 WHEREAS, Baykeeper and Granite Rock (collectively, the “Parties”) have been working
4 together in good faith to reach a settlement agreement in this action;

5 WHEREAS, pursuant to a request by Plaintiff (Dkt. 5), the Court set the initial Case
6 Management Conference in this matter for July 26, 2016 at 1:30 p.m., and continued the other
7 deadlines in the case until one week before the Case Management Conference (Dkt. 6);

8 WHEREAS, the Parties desire to continue informal negotiations in good faith, and anticipate
9 reaching a final settlement in this action within the next ten (10) weeks.

10 NOW, THEREFORE, THE PARTIES STIPULATE AS FOLLOWS:

- 11 1. The Case Management Conference shall be continued to September 13, 2016, at 1:30
12 p.m., or at such later date that is convenient for the Court, in order to give the Parties a
13 chance to complete settlement negotiations without involving the resources of the
14 Court.
- 15 2. The Parties’ ADR certifications and stipulations to ADR process or notices of need for
16 an ADR phone conference shall be due no later than one week before the Case
17 Management Conference.
- 18 3. The Parties’ Rule 26(f) Report and Joint Case Management Statement shall be due no
19 later than one week before the Case Management Conference.
- 20 4. The Parties’ initial disclosures or objections in their Rule 26(f) Report shall be due no
21 later than one week before the Case Management Conference.

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1 WHEREFORE, the Parties respectfully request the Court to approve and enter the Proposed
2 Order below.

3 DATE: July 7, 2016

Respectfully Submitted,

4 /s/ Nicole C. Sasaki

5 _____
NICOLE C. SASAKI
6 Attorney for Plaintiff
SAN FRANCISCO BAYKEEPER
7 GRANITE ROCK COMPANY

8 DATE: July 7, 2016

9 By: /s/ Gregory O'Hara

10 _____
GREGORY O'HARA

11 Attorney for Defendant
12 GRANITE ROCK COMPANY

13 I attest that concurrence in the filing of this document has been obtained from Gregory O'Hara
14 for Granite Rock.

15 DATE: July 7, 2016

SAN FRANCISCO BAYKEEPER

16 By: /s/ Nicole C. Sasaki

17 _____
NICOLE C. SASAKI

18 Attorney for Plaintiff
19 SAN FRANCISCO BAYKEEPER

~~[PROPOSED]~~ ORDER


GOOD CAUSE APPEARING,

1. The Case Management Conference shall be continued to 9/27/16
at 1:30 p.m.
2. The Parties' ADR certifications and stipulations to ADR process or notices of need for an ADR phone conference shall be filed no later than one week before the Case Management Conference.
3. The Parties' Rule 26(f) Report and Joint Case Management Statement shall be filed no later than one week before the Case Management Conference.
4. The Parties' initial disclosures or objections in their Rule 26(f) Report shall be filed no later than one week before the Case Management Conference.

IT IS SO ORDERED.

Date: 7/8/16

NORTHERN DISTRICT OF CALIFORNIA



Honorable Kandis A. Westmore
United States District Court