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Attorneys for the Plaintiffs and Putative Class

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 9 UNITED STATE DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA

11 JAVANNI MUNGUIA-BROWN, ANGELINA  
 12 MAGAÑA, and NORMA RODRIGUEZ,  
 individually and on behalf of others similarly  
 13 situated,

14 Plaintiffs,  
 15 vs.

16 EQUITY RESIDENTIAL, a real estate investment  
 trust, ERP OPERATING LIMITED  
 17 PARTNERSHIP, a partnership, EQUITY  
 RESIDENTIAL PROPERTIES MANAGEMENT  
 CORPORATION, EQUITY RESIDENTIAL  
 18 MANAGEMENT, LLC, EQR-WOODLAND  
 PARK A LIMITED PARTNERSHIP, EQR-  
 19 WOODLAND PARK B LIMITED  
 PARTNERSHIP, and DOES FOUR through TWO  
 20 HUNDRED AND FIFTY inclusive,

21 Defendants.

Case No.: 4:16-cv-01225-JSW

**JOINT STIPULATION TO EXTEND THE  
 BRIEFING SCHEDULE ON THE MOTION  
 TO STAY THIS ACTION AND  
~~PROPOSED~~ ORDER AS MODIFIED**

1 Plaintiffs Javanni Munguia-Brown, Angelina Magaña, and Norma Rodriguez (“Plaintiffs”) and  
2 Defendants Equity Residential, ERP Operating Limited Partnership, Equity Residential Management  
3 L.L.C., EQR-Woodland Park A Limited Partnership, and ERQ-Woodland Park B Limited Partnership  
4 (“Defendants”) by and through their respective counsel, hereby stipulate pursuant to Local Rule 6-2 as  
5 follows:

6 WHEREAS, this case was originally filed on September 3, 2014 in California State Court in  
7 Alameda County (RG14739053) and was removed by Defendants to federal court on March 11, 2016;

8 WHEREAS, on April 14, 2016, Defendants filed a Motion to Stay This Action pending the  
9 outcome of the class certification motion to be filed in June of 2016 in *Razuki v. Equity Residential*,  
10 Case No. 3:15-CV-01057-BEN-JLB before the Honorable Roger T. Benitez in the Southern District of  
11 California (filed on May 11, 2015), which involves the same defendants, the same putative class  
12 members, and largely the same subject matter as this action;

13 WHEREAS, on May 19, 2016, a Joint Motion for Dismissal (attached as Exhibit A to the Ryan  
14 Declaration) was filed by all the parties in *Razuki v. Equity Residential* (Case No. 3:15-CV-01057-  
15 BEN-JLB);

16 WHEREAS, Plaintiffs’ Opposition to the Motion to Stay is due May 27, 2016;

17 WHEREAS, the Parties have agreed to the following stipulations:

- 18 1. Given the Joint Motion for Dismissal in *Razuki v. Equity Residential* (Case No. 3:15-  
19 CV-01057-BEN-JLB), the Parties agree to extend the briefing schedule for the  
20 Opposition to the Motion to Stay and the Reply in Support of the Motion to Stay as the  
21 Order in *Razuki* will likely moot Defendants’ Motion to Stay. The June 10, 2016  
22 hearing on the Motion to Stay will be taken off calendar.
- 23 2. Upon the issuance of the *Razuki* court’s Order granting the dismissal in *Razuki v. Equity*  
24 *Residential* (Case No. 3:15-CV-01057-BEN-JLB), Defendants in this case have agreed  
25 to file a Notice to withdraw their Motion to Stay.
- 26 3. If the *Razuki* court does not grant the Joint Motion for Dismissal in Case No. 3:15-CV-  
27 01057-BEN-JLB, Plaintiffs will have ten days from the date of the *Razuki* Order to file  
28

1 their Opposition to the Motion to Stay and Defendants will have seventeen days from  
2 the date of the *Razuki* Order to file their Reply in Support of the Motion to Stay. The  
3 Parties will jointly request a new hearing date from the Court.

4 **IT IS SO STIPULATED.**

5 Dated: May 25, 2016

6 Respectfully submitted,

7 GOLDSTEIN, BORGEN, DARDARIAN & HO

8 /s/ Megan Ryan

9 Megan Ryan

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Attorneys for the Plaintiffs and Putative Class

1 Dated: May 25, 2016

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2  
3 /s/ Aaron T. Winn

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1 ~~PROPOSED~~ ORDER

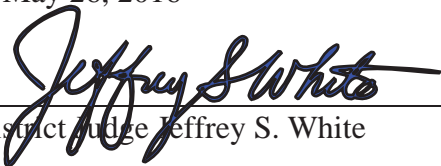
2  
3 Given the Joint Motion for Dismissal in *Razuki v. Equity Residential* (Case No. 3:15-CV-  
4 01057-BEN-JLB), the Court orders an extension of the briefing schedule for the Opposition to the  
5 Motion to Stay and the Reply in Support of the Motion to Stay as the Order in *Razuki* will likely moot  
6 Defendants' Motion to Stay. The June 10, 2016 hearing on the Motion to Stay will be taken off  
7 calendar. Defendants shall notify the Court upon the issuance of the *Razuki* Order on the Joint Motion  
8 to Dismiss.

9 Upon the issuance of the *Razuki* court's Order granting the dismissal in *Razuki v. Equity*  
10 *Residential* (Case No. 3:15-CV-01057-BEN-JLB), the Defendants will file a Notice to withdraw their  
11 Motion to Stay.

12 If the *Razuki* court does not grant the Joint Motion for Dismissal in Case No. 3:15-CV-01057-  
13 BEN-JLB, Plaintiffs will have ten days from the date of the *Razuki* Order to file their Opposition to the  
14 Motion to Stay and Defendants will have seventeen days from the date of the *Razuki* Order to file their  
15 Reply in Support of the Motion to Stay. The Parties will jointly request a new hearing date from the  
16 Court. The June 10, 2016 Case Management Conference is vacated and will be rescheduled by the Court, if  
17 necessary.

18 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

19 Dated: May 26, 2016

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21 U.S. District Judge Jeffrey S. White