

1 Pursuant to Civil Local Rules 6-1(b) and 6-2 of the Northern District of California,
2 plaintiff Patricia Jordan (“plaintiff”) and defendants the Presidio Trust and the U.S. Equal
3 Employment Opportunity Commission (collectively, “defendants”), by and through their
4 respective counsel, respectfully submit this stipulated request to: (1) extend the time for
5 defendant to respond to plaintiffs’ Complaint, and (2) modify the briefing schedule for
6 defendants’ anticipated motion to dismiss as follows, as follows:

7 1. Defendants intend to respond to plaintiff’s Complaint by filing a motion to
8 dismiss. Under the current schedule, defendants’ response (motion) is due on September 16,
9 2016; plaintiff’s opposition to the motion is due two weeks later, on September 30, 2016; and
10 defendants’ reply is due the following week, on October 7, 2016;

11 2. The parties agree that the briefing schedule should be modified due to the
12 anticipated complexity of defendants’ forthcoming motion, which defendants represent will raise
13 jurisdictional issues and will also argue that plaintiff has failed to state a claim upon which relief
14 will be granted. The commentary to the Civil Local Rules instructs that the default two weeks
15 for an opposition and one week for a reply “are minimum time periods,” and that for “complex
16 motions,” such as the one that defendants anticipate filing here, “parties are encouraged to
17 stipulate or seek a Court order establishing a longer notice period with correspondingly longer
18 periods for response or reply.” Civil. L.R. 7-2 Commentary.

19 3. In addition, defendants represent that their motion must be reviewed by multiple
20 federal agencies before it can be filed, and additional time is needed due to the press of business.
21 Similarly, the press of business informs the parties’ agreement that the timeframes for the
22 opposition and the reply should be enlarged, since counsel for the parties must also continue their
23 work on other matters during the time allowed for the briefing here.

24 4. For these reasons, the parties request that the Court enter the following stipulated
25 briefing schedule: defendants’ motion to dismiss due by Monday, September 26; plaintiffs’
26 opposition due by Friday, November 4; defendants’ reply due by Thursday, Nov. 17.

