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 OPPORTUNITY COMMISSION
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15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

18)	Case No. 16-cv-02122 KAW
19	PATRICIA JORDAN,)	
20	Plaintiff,)	
21	v.)	SECOND STIPULATED REQUEST FOR
22	PRESIDIO TRUST, and THE U.S. EQUAL)	ORDER CHANGING TIME TO RESPOND
23	EMPLOYMENT OPPORTUNITY)	TO PLAINTIFFS' COMPLAINT AND TO
24	COMMISSION,)	MODIFY BRIEFING SCHEDULE
25	Defendants.)	
26)	
27)	
28)	

1 Pursuant to Civil Local Rules 6-1(b) and 6-2 of the Northern District of California,
2 defendants the Presidio Trust and the U.S. Equal Employment Opportunity Commission
3 (collectively, “defendants”), by and through their respective counsel, and with the consent of
4 plaintiff Patricia Jordan (“plaintiff”), respectfully submit this stipulated request to: (1) extend the
5 time for 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 26,
9 2016; plaintiff’s opposition to the motion is due on November 4; and defendants’ reply is due on
10 November 17. Defendants request an adjustment of three-business days for each deadline, such
11 that defendants’ response (motion) would be due on September 29; plaintiff’s opposition to the
12 motion due would be due on November 9; and defendants’ reply would be due on November 22.

13 2. Defendants represent that the additional time is needed to allow the multiple
14 federal agencies reviewing defendants’ draft brief to complete their review process to finalize the
15 motion to dismiss, and because defendants’ undersigned counsel was out of work on
16 unanticipated sick leave on Friday, September 23, and Monday, September 26.

17 3. The requested modification will alter the briefing schedule set by the Court for
18 defendants’ anticipated motion to dismiss. Two prior extensions of time have previously been
19 requested and granted; on August 30, 2016, the Court granted defendants’ request to extend the
20 deadline for responding to the Complaint, *see* ECF No. 30, and on September 22, the Court
21 granted the parties’ stipulated request to modify the briefing schedule, *see* ECF No. 35.
22 Defendants do not anticipate seeking any further extensions of the deadline for filing the motion
23 to dismiss.

24 4. The requested time modification will not alter any other event or deadline. The
25 next case management conference in this case is scheduled for November 29, 2016 at 1:30pm.

26 IT IS SO STIPULATED AND REQUESTED.
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Dated: September 26, 2016

/s/ Timothy S. Thimesch
TIMOTHY S. THIMESCH, ESQ.
THIMESCH LAW OFFICES
Attorneys for Plaintiff PATRICIA JORDAN

Dated: September 26, 2016

/s/ Lisa Zeidner Marcus
LISA ZEIDNER MARCUS¹
Counsel for Defendants
PRESIDIO TRUST; and THE U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION

Proposed ORDER

Pursuant to stipulation, it is SO ORDERED.

DATE: 9/27/16

Kandis Westmore
HON. KANDIS A. WESTMORE
UNITED STATES MAGISTRATE JUDGE

¹ I, Lisa Zeidner Marcus, hereby attest, in accordance with the Civil L.R. 5-1(i)(3), the concurrence in the filing of this document has been obtained from the other signatory listed here.