

1 Stephen R. Jaffe (SBN 49539)
 THE JAFFE LAW FIRM
 2 Stephen.r.jaffe@jaffetriallaw.com
 1 Sansome Street, Suite 3500
 3 San Francisco, CA 94104
 Telephone: (415) 618-0100
 4 *Attorneys for Relator*
 STEVEN FALLON

5 Sanjay Bhandari (SBN 181920)
 6 MCNAMARA SMITH LLP
 sbhandari@mcnamarallp.com
 7 655 W. Broadway, Suite 1680
 San Diego, CA 92101
 8 Telephone: (619) 269-0400
Attorneys for Defendant
 9 BELL TRANSIT CORP.

10 Joseph T. Urbanic (SBN302094)
 JACOBSON MARKHAM LLP
 11 jurbanic@jacobsonmarkham.com
 890 Cal Center Dr., Suite 210
 12 Sacramento, CA 95826
 Telephone: (916) 854-5969
 13 *Attorneys for Defendants*
 HAYWARD UNIFIED SCHOOL DISTRICT,
 14 MATTHEW WAYNE, MIRIAM GONZALEZ,
 LUCI ROGERS, and TAMMY WATSON

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 16 UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 17 OAKLAND DIVISION

18 UNITED STATES OF AMERICA, ex rel.,
 STEVEN FALLON, and on behalf of the
 19 STATE OF CALIFORNIA,

20 Plaintiffs-Relators,

21 v.

22 BELL TRANSIT CORPORATION, et al.,

23 Defendants.

Case No. 4:16-cv-06994-PJH

**STIPULATION TO EXTEND DATES AND
 [PROPOSED] ORDER THEREON**

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 26 Pursuant to Rules 6-1(b) and 6-2 of the Northern District Civil Local Rules, Relator
 27 STEVEN FALLON and all active Defendants (BELL TRANSIT CORP., HAYWARD UNIFIED
 28 SCHOOL DISTRICT, MATTHEW WAYNE, MIRIAM GONZALEZ (formerly Delgadillo), and

1 TAMMY WATSON) (collectively, the “Parties”) hereby agree to recommend that the Court
2 extend several dates in this case for the reasons set forth below.

3 1. Relator’s counsel believes he needs more time to respond to the two motions to
4 dismiss filed on September 8, 2020, noting that the motions are lengthy, and that he also faces an
5 opposition to a motion for summary judgment in another case, due October 8, 2020. He therefore
6 requests that the briefing schedule be amended to allow his opposition to be filed one week after
7 the briefing on that motion, i.e., October 15, with the reply briefing also extended one week to
8 October 29.

9 2. Defendants are inclined to agree as a professional courtesy. However, this briefing
10 schedule conflicts with the Court’s scheduling order (ECF 51), which set the Case Management
11 Conference (CMC) on October 15, 2020 at 2:00 p.m. The Parties agree that it would be best to
12 continue the CMC and related dates until after the pleadings are settled.

13 3. The Parties agree that these time modifications will not materially alter the
14 schedule for this case since there is no trial date or other events or deadlines on calendar.

15 **NOW, THEREFORE, IT IS HEREBY STIPULATED BY AND AMONG THE**
16 **PARTIES, SUBJECT TO THE COURT'S APPROVAL, THAT:**

17 1. Relator shall respond to Defendants’ motions to dismiss by October 15, 2020.

18 2. Defendants shall file reply briefs by October 29, 2020.

19 3. The CMC will occur on December 17, 2020 at 2:00 PM (or such date thereafter as
20 the Court selects). The Parties will confer pursuant to Rule 26(f) at least 21 days prior, submit a
21 joint CMC statement at least 7 days prior, and serve Rule 26(a)(1) initial disclosures in
22 accordance with Rule 26(a)(1)(C).

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, ex rel.,
STEVEN FALLON and on behalf of the
STATE OF CALIFORNIA, ,

Plaintiffs-Relators,

v.

BELL TRANSIT CORPORATION; et al.,

Defendants.

Case No. 4:16-cv-06994-PJH

~~PROPOSED~~ ORDER EXTENDING
DATES

Pursuant to the stipulation entered by the parties and good cause appearing therefor:

1. Relator shall respond to Defendants’ motions to dismiss on or before October 15, 2020.
2. Defendants shall file reply briefs on or before October 29, 2020. The Court will notify the Parties if the Court wishes to hear oral argument.
3. The Case Management Conference (CMC) will occur on December 17, 2020 at 2:00 PM. The Parties will confer pursuant to Rule 26(f) at least 21 days prior to the CMC, submit a joint CMC statement in the format previously ordered at least 7 days prior to the CMC, and serve Rule 26(a)(1) initial disclosures in accordance with Rule 26(a)(1)(C).

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CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of September, 2020, the foregoing document, **STIPULATION TO EXTEND DATES AND [PROPOSED] ORDER THEREON**, was electronically transmitted to the Clerk’s Office using the CM/ECF System for filing, and for transmittal of a Notice of Electronic Filing to all counsel of record who are deemed to have consented to electronic service via the Court’s CM/ECF system.

/s/ Sanjay Bhandari
Sanjay Bhandari
Attorneys for Defendant Bell Transit Corporation