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TIMOTHY ABOUDARA, JR., et al.
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16 IN THE UNITED STATES DISTRICT COURT
17 FOR THE NORTHERN DISTRICT OF CALIFORNIA
18

19 TIMOTHY ABOUDARA, JR. et al.

20 Plaintiffs,

21 v.

22 CITY OF SANTA ROSA,

23 Defendant.
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Case No. 17-CV-01661-HSG

**STIPULATION TO EXTEND BRIEFING
SCHEDULE ON PLAINTIFFS' MOTION FOR
CONDITIONAL CERTIFICATION; ORDER**

[Civil Local Rule 6-2]

Date: August 31, 2017

Time: 2:00 p.m.

Judge: Hon. Haywood S. Gilliam, Jr.

Oakland Courthouse

Courtroom 2 – 4th Floor

1301 Clay Street

Oakland, CA 94612

1 **STIPULATION TO EXTEND BRIEFING SCHEDULE**

2 Plaintiffs Timothy Aboudara, Jr., et al. filed their Motion for Conditional Certification and
3 Facilitated Notice on June 30, 2017. (Dkt. 24.) Pursuant to Civil Local Rule 7-3(a), Defendant City of
4 Santa Rosa’s opposition is due on July 14, 2017. Defendant’s lead counsel is out of the country on a
5 previously-scheduled vacation and will not return to the office until July 17, 2017. The time for
6 Defendant to respond to the motion has been further impacted by the Fourth of July holiday.

7 The parties stipulate and hereby respectfully request that the Court continue the deadline for the
8 filing of Defendant’s opposition to July 28, 2017, and continue the deadline for the filing of Plaintiffs’
9 reply to August 4, 2017. The parties do not seek a continuance of the hearing date, and request that the
10 motion be heard on August 31, 2017.

11 The parties further stipulate and hereby respectfully request that should the Court continue the
12 hearing, the statute of limitations for all putative plaintiffs subject to the motion for conditional
13 certification and facilitated notice be tolled from August 31, 2017, until the date this Court issues an
14 Order granting or denying Plaintiff’s motion.

15 IT IS SO STIPULATED.

16 Dated: July 10, 2017

RENNE SLOAN HOLTZMAN SAKAI LLP

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18 By: /s/ Kevin P. McLaughlin
19 KEVIN P. MCLAUGHLIN

20 Attorneys for Defendant
21 CITY OF SANTA ROSA

22 Dated: July 10, 2017

MASTAGNI HOLSTEDT, A.P.C.

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24 By: /s/ David E. Mastagni
25 DAVID E. MASTAGNI

26 Attorneys for Plaintiffs
27 TIMOTHY ABOUDARA, JR. et al.
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RENNE SLOAN HOLTZMAN SAKAI LLP
Attorneys at Law

1 **ATTESTATION PURSUANT TO LOCAL RULE 5-1**

2 Pursuant to N.D. Cal. Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document
3 has been obtained from each of the other signatories.

4 Dated: July 10, 2017

5 By: /s/ Kevin P. McLaughlin
6 KEVIN P. MCLAUGHLIN

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8 **ORDER**

9 The Court, having considered the Stipulation of the parties, and good cause appearing therefore,
10 hereby orders that the deadline for the filing of Defendant's opposition to Plaintiffs' Motion for
11 Conditional Certification and Facilitated Notice is continued to July 28, 2017, and the deadline for the
12 filing of Plaintiffs' reply is continued to August 4, 2017. The hearing date of August 31, 2017 remains
13 unchanged.

14 IT IS SO ORDERED.

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16 Dated: July 10, 2017

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18 Hon. Haywood S. Gilliam, Jr.
19 UNITED STATES DISTRICT JUDGE

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RENNE SLOAN HOLTZMAN SAKAI LLP
Attorneys at Law