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9 Attorneys for Defendant
 10 San Jose Police Officers' Association ("SJPOA")

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

13 CITY OF SAN JOSE,

14 Plaintiff,

15 v.

16 SAN JOSE POLICE OFFICERS'
 ASSOCIATION; SAN JOSE
 17 FIREFIGHTERS; I.A.F.F., LOCAL
 230; MUNICIPAL EMPLOYEES'
 18 FEDERATION, AFSCME, LOCAL
 101; CITY ASSOCIATION OF
 19 MANAGEMENT PERSONNEL,
 IFPTE, LOCAL 21, THE
 20 INTERNATIONAL UNION OF
 OPERATING ENGINEERS, LOCAL
 21 NO. 3; and DOES 1-10,

22 Defendants.

No. C12-02904 LHK PSG

**STIPULATION AND ~~PROPOSED~~ ORDER
 RE: CONSOLIDATED BRIEFING ON
 MOTIONS TO DISMISS**

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1 In accordance with the Court's instruction, the parties have met and conferred
2 and although unable to reach a global agreement on a single consolidated Motion to
3 Dismiss, have reached an agreement to streamline and expedite the resolution of the
4 Motions to Dismiss as set forth below.

5 IT IS HEREBY STIPULATED AND AGREED by and among the
6 undersigned parties, by and through their counsel, that:

- 7
- 8 1. The hearing on all defendants' Motions to Dismiss the First Amended Complaint
9 will occur on October 4, 2012.
 - 10 2. Defendant Municipal Employees' Federation, AFSCME, Local 101 may file a
11 separate Motion to Dismiss no later than August 3, 2012, presenting alternative
12 grounds for dismissal.
 - 13 3. On or before August 20, 2012, the City of San Jose will file one consolidated
14 opposition brief to all Motions to Dismiss, not to exceed 45 pages.
 - 15 4. Defendants will file one consolidated reply brief not to exceed 25 pages on or
16 before September 13, 2012, *i.e.*, at least 21 days before the October 4 court
17 hearing on the motions.
 - 18 5. Given the overlap in arguments and pressing deadlines relating to Measure B,
19 the parties respectfully request that the Court rule as soon as practicable after
20 the October 4 hearing on the motions.
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Dated: July __, 2012

CARROLL, BURDICK & McDONOUGH LLP

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Gregg McLean Adam
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Gonzalo Martinez
Jennifer S. Stoughton
Amber L. West
Attorneys for Defendant
San Jose Police Officers' Association

Dated: July __, 2012

WYLIE McBRIDE PLATTEN & RENNER

By _____
John A. McBride
Christopher E. Platten
Mark S. Renner
Attorneys for Defendant
San Jose Firefighters, IAFF Local 230

Dated: July 24, 2012

BEESON TAYER & BODINE

By _____
Vishtasp Mehr Soroushian
Teague Pryde Paterson
Vishtasp Mehr Soroushian
Attorneys for Defendant
Municipal Employees' Federation, AFSCME,
Local 101

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Christopher E. Platten
Mark S. Renner
Attorneys for Defendant
City Association of Management Personnel,
IFPTE, Local 21

Dated: July __, 2012

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John A. McBride
Christopher E. Platten
Mark S. Renner
Attorneys for Defendant
International Union of Operating Engineers,
Local No. 3

Dated: July __, 2012

MEYERS, NAVE, RIBACK, SILVER
& WILSON

By _____
Michael Christian Hughes
Jennifer Lynne Nock
Linda Margaret Ross
Attorneys for Plaintiff
City of San Jose

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: July 24, 2012



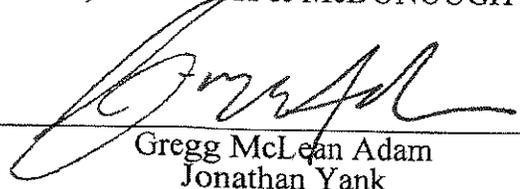
HON. LUCY H. KOH
United States District Court Judge

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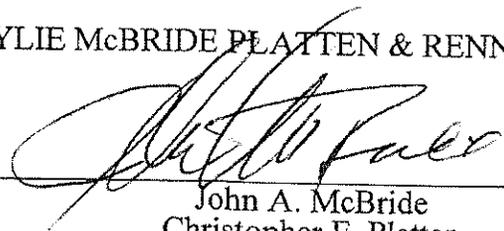
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San Jose Firefighters, IAFF Local 230

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Municipal Employees' Federation, AFSCME,
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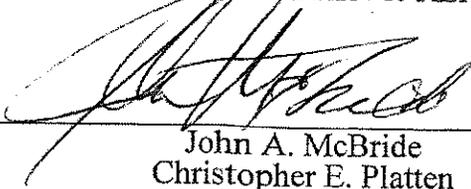
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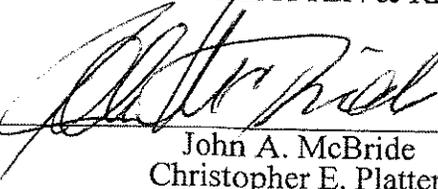
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City Association of Management Personnel,
IFPTE, Local 21

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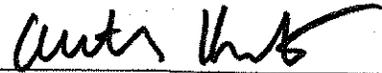
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