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an unincorporated association doing business as Major League
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Attorneys for Plaintiffs
THE CITY OF SAN JOSE; THE CITY OF
JOSE, AS SUCCESSOR AGENCY TO THE
REDEVELOPMENT AGENCY OF THE
CITY OF SAN JOSE; and THE SAN JOSE
DIRIDON DEVELOPMENT AUTHORITY

EX-300-A&B1-BHE

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA / SAN JOSE DIVISION

CITY OF SAN JOSÉ; CITY OF SAN
JOSÉ AS SUCCESSOR AGENCY TO
THE REDEVELOPMENT AGENCY OF
THE CITY OF SAN JOSÉ; and THE SAN
JOSÉ DIRIDON DEVELOPMENT
AUTHORITY,

24 Plaintiffs,
25 v.

26 OFFICE OF THE COMMISSIONER OF
27 BASEBALL, an unincorporated association
doing business as Major League Baseball;
and ALLAN HUBER "BUD" SELIG,

28 Defendants.

Case No. 13-CV-02787-RMW

**JOINT STIPULATION AND
ORDER TO EXTEND ADR DEADLINE**

Judge: Hon. Ronald M. Whyte

Date Filed: June 18, 2013

Trial Date: None set

1 Plaintiffs City of San Jose, City of San Jose as successor agency to the Redevelopment
2 Agency of the City of San Jose, and the San Jose Diridon Development Authority (collectively
3 “San Jose” or “Plaintiffs”) and Defendants the Office of the Commissioner of Baseball and Allan
4 H. Selig (collectively “MLB” or “Defendants”) (collectively, the “Parties”), jointly submit this
5 Joint Stipulation and Proposed Order to Extend ADR Deadline.

6 WHEREAS, on June 18, 2013, the Court assigned this matter to the Alternative Dispute
7 Resolution (ADR) Multi-Option Program (*see* Dkt. 4);

8 WHEREAS, Local Rules require the Parties to either stipulate to an ADR option or
9 request a telephone conference with ADR staff (*see* N.D. Cal. Civ. L:R. 16-8(c); N.D. Cal. ADR
10 L.R. 3-5(c));

11 WHEREAS, the Defendants have filed a Motion to Dismiss all of Plaintiffs’ claims for
12 failure to state a claim (*see* Dkt. 25);

13 WHEREAS, the Parties do not believe they can settle on an agreed ADR process until the
14 Court clarifies the scope of this matter by ruling on the Motion to Dismiss.

15 IT IS HEREBY STIPULATED AND AGREED that the deadline to file a Stipulation to
16 ADR Process or Notice of Need for ADR Telephone Conference is hereby extended until 30 days
17 after the Court rules on any Motion to Dismiss.

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20 Dated: September 12, 2013

KEKER & VAN NEST LLP

21
22 By: /s/ John Keker
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24 PAULA L. BLIZZARD
25 THOMAS E. GORMAN

26 Attorneys for Defendants
27 OFFICE OF THE COMMISSIONER OF
28 BASEBALL,
an unincorporated association doing
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SELIG

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Dated: September 12, 2013

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JOSE DIRIDON DEVELOPMENT
AUTHORITY

IT IS SO ORDERED.

DATED: JEBJ FH


The Honorable Ronald M. Whyte
Judge of the Northern District of California