1 2 3 4 5 6 7	ANNE I. YEN, Bar No. 187291 KERIANNE R. STEELE, Bar No. 250897 WEINBERG, ROGER & ROSENFELD A Professional Corporation 1001 Marina Village Parkway, Suite 200 Alameda, California 94501 Telephone (510) 337-1001 Fax (510) 337-1023 E-Mail: ayen@unioncounsel.net ksteele@unioncounsel.net	nion, Local 521
8	IN THE UNITED STATES DISTRICT COURT	
9	FOR THE NORTHERN DISTRICT OF CALIFORNIA	
10		
11	JEFFREY LUM, et al.,	No. 14-CV-05230 LHK
12	Plaintiffs,	STIPULATED REQUEST FOR EXTENSION OF TIME TO RESPOND
13	V.	TO COMPLAINT; [PROPOSED] ORDER THEREON
14	SERVICE EMPLOYEES INTERNATIONAL	[LOCAL RULE 6-1]
15	UNION, LOCAL 521, et al.,	Hearing Date: N/A
16	Defendants.	Time: N/A Courtroom: N/A
17		Judge: Hon. Lucy H. Koh
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WEINBERG, ROGER & ROSENFELD A Professional Corporation 1001 Marina Village Parkway, Suite 200 Alaneda, California 94501 (S10) 337-1001	STIPULATED REQUEST FOR EXTENSION OF TIM ORDER THEREON Case No. 14-CV-05230 LHK	IE TO RESPOND TO COMPLAINT; [PROPOSED] Dockets.Justia.

STIPULATED REQUEST FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

The parties to the above-captioned case, by and through their undersigned counsel of record, hereby respectfully request that Defendants Service Employees International Union, Local 521 (hereinafter "SEIU Local 521"), Alan Minato,¹ Controller-Treasurer of the County of Santa Clara (hereinafter "Controller-Treasurer Minato"), and County of Santa Clara (hereinafter "County") be granted until and including February 6, 2015, to respond to Plaintiffs' Complaint. In support of that request, the parties state as follows:

The responsive pleading on behalf of Controller-Treasurer Minato is currently due 1. January 16, 2015. The requested extension until and including February 6, 2015 will afford Controller-Treasurer Minato a twenty-one (21) day extension of time to respond to the Complaint.

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2. The responsive pleading on behalf of the County is currently due January 12,

2015. The requested extension until and including February 6, 2015 will afford County a twentyfive (25) day extension of time to respond to the Complaint.

15 3. The responsive pleading on behalf of SEIU Local 521 is currently due on January 16 8, 2015. The requested extension until and including February 6, 2015 will afford Local 521 a 17 twenty-eight (28) day extension of time to respond to the Complaint.

4. No previous extensions of time to respond to the Complaint have been requested or granted in this case.

205. The requested extension of time is necessary because Defendants have either only recently secured, or are currently in the process of securing, counsel to represent them in this 22 case, Plaintiffs' Complaint contains numerous factual allegations that counsel must investigate in 23 order to prepare responsive pleadings, and Defendants' counsel have a number of litigation 24 commitments that will require their attention during the month of January.

- 25 Former Controller-Treasurer Irene Lui left her official position with the County of Santa Clara 26
- after the Complaint in this matter was filed. She has been succeeded in her official capacity as the County of Santa Clara Controller-Treasurer by Alan Minato. Pursuant to Rule 25(d) of the 27 Federal Rules of Civil Procedure, Mr. Minato will be automatically substituted for Ms. Lui in his official capacity as Controller-Treasurer for the County of Santa Clara. 28

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1	6. The requested extension of time will not require the Court to reschedule any	
2	pretrial dates previously scheduled in this case.	
3	The foregoing is hereby stipulated among the parties in this action, who respectfully	
4	request the Court to grant the extension of time.	
5	Dated: January 5, 2015	GARY, TILL & BURLINGHAM
6		
7	By:	/s/ Steven Burlingham (with permission) STEVEN BURLINGHAM
8		Attorneys for Plaintiffs JEFFREY LUM; ANDREW LI; and the Classes They Seek to
9		Represent Gary, Till & Burlingham
10		5330 Madison Avenue, Suite F Sacramento, CA 95841
11		Phone: (916) 332-8122 Facsimile: (916) 332-8153
12	Dated: January 5, 2015	COUNTY OF SANTA CLARA
13		
14	By:	/s/ Nancy Clark (<i>with permission</i>) ORRY P. KORB
15		NANCY CLARK Attorneys for Defendants COUNTY OF SANTA
16		CLARA and ALAN MINATO, as Controller- Treasurer, County of Santa Clara
17		Santa Clara County Office of County Counsel 70 West Hedding St., 9th Floor
18		San Jose, CA 95110 Phone: (408) 299-5900
19		Facsimile: (408) 292-7240
20	Dated: January 5, 2015	WEINBERG, ROGER & ROSENFELD A Professional Corporation
21		
22	By:	/s/ Kerianne R. Steele KERIANNE R. STEELE
23	by.	Attorneys for SEIU Local 521 Weinberg, Roger & Rosenfeld
24		1001 Marina Village Parkway, Suite 200 Alameda, CA 94501
25		Phone: (510) 337-1001 Facsimile: (510) 337-1023
26		raesinine. (510) 557-1025
27		
28		
WEINBERG, ROGER & ROSENFELD A Professional Corporation 1001 Marina Villee Patway, Suite 200 Alameda, California 94501 (510) 337-1001	STIPULATED REQUEST FOR EXTENSION ORDER THEREON Case No. 14-CV-05230 LHK	2 OF TIME TO RESPOND TO COMPLAINT; [PROPOSED]

1	[PROPOSED] ORDER
2	IT IS SO ORDERED
3	Dated: January 7, 2015
4	By: HONORAPLE LUCY H. KOH United State District Court Judge
6	United State District Court Judge
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WEINBERG, ROGER & ROSENFELD A Professional Corporation 1001 Marina 'Ulige Patway, Solie 200 Alameda, California 94501 (510) 337-1001	3 STIPULATED REQUEST FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT; [PROPOSED] ORDER THEREON Case No. 14-CV-05230 LHK