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Attorney for Plaintiff,
 Anthony Maranon

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANTHONY MARANON,

Plaintiff,

vs.

SANTA CLARA STADIUM AUTHORITY;
 CITY OF SANTA CLARA; FORTY NINERS
 STADIUM MANAGEMENT COMPANY
 LLC;

Defendants.

No. 5:15-cv-04709-BLF

**STIPULATION TO EXTEND TIME FOR
 PARTIES TO CONDUCT THE JOINT
 SITE INSPECTION REQUIRED BY
 GENERAL ORDER 56 AND THE
 SCHEDULING ORDER; [PROPOSED]
 ORDER**

Complaint filed: October 12, 2015

Trial Date: None set

Plaintiff, Anthony Maranon (“Maranon”), and Defendants, Santa Clara Stadium Authority, City of Santa Clara, and Forty Niners Stadium Management Company LLC (collectively “Defendants,” and together with Maranon, “the Parties”), by and through their respective attorneys, hereby stipulate and agree as follows:

1. All parties named in the action have been served and have appeared.
2. This action arises in part out of Maranon’s claim that Defendants discriminated against him by denying him full and equal access to the Levi’s Stadium in Santa Clara, California (“the Stadium”) on account of his disability, specifically that he must use a wheelchair for mobility, in violation of the Americans with Disabilities Act (“ADA”).

STIPULATION TO EXTEND TIME FOR PARTIES TO CONDUCT JOINT SITE INSPECTION;
 [PROPOSED] ORDER

1 Accordingly, this matter proceeds under this Court's General Order 56 which governs ADA
2 access actions.

3 3. The Court issued a "Scheduling Order for Cases Asserting Denial of Right of
4 Access Under Americans with Disabilities Act Title II and III" on October 13, 2015 (Dkt. 4).
5 The Scheduling Order set the last date for a Joint Site Inspection of the Stadium as January 26,
6 2016. This Joint Site Inspection is required under General Order 56.

7 4. The Parties have agreed that in order to address Maranon's claims for injunctive
8 relief, two joint site inspections will take place: one when the Stadium is in full operation so
9 that the policies and practices of the Stadium while in use can be evaluated; and the other when
10 the Stadium is not operational in order to as efficiently as possible inspect the architectural
11 conditions at the Stadium.

12 5. Due to the availability of counsel, their consultants, the Parties, and the
13 schedule of the Stadium itself (for which limited events are available for purposes of the
14 operational inspection), the Parties have agreed to conduct the non-operational inspection on
15 Friday, April 8, 2016, and the operational inspection on Saturday, April 9, 2016.

16 6. The Parties acknowledge that the proposed dates for the two site inspections fall
17 outside the January 26, 2016 date set by the Scheduling Order to complete the Joint Site
18 Inspection. The Parties have been working together cooperatively to reach an agreeable
19 schedule for what is a large undertaking, and for which there are multiple schedules to consider
20 and accommodate. The Parties believe that the two site inspections will yield the greatest
21 possibility that, at a minimum, Maranon's claims under the ADA can be resolved through
22 settlement.

23 7. The Parties therefore believe that good cause exists to extend the last date to
24 complete the Joint Site Inspection from January 26, 2016 to April 9, 2016 as they continue to
25 work together to identify, and try to resolve, Maranon's claims for injunctive relief, and the
26 Parties therefore stipulate to such an extension pending the Court's approval.

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STIPULATION TO EXTEND TIME FOR PARTIES TO CONDUCT JOINT SITE INSPECTION;
[PROPOSED] ORDER

1 **IT IS SO STIPULATED.**

2
3 Dated: January 21, 2016

MOORE LAW FIRM, P.C.

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5
6 /s/ Tanya E. Moore

TANYA E. MOORE

Attorney for Plaintiff

ANTHONY MARANON

8 LOMBARDI, LOPER & CONANT, LLP

9
10
11 /s/ Kara A. Abelson

KARA A. ABELSON

MATTHEW S. CONANT

Attorneys for Defendants

SANTA CLARA STADIUM AUTHORITY,

14 CITY OF SANTA CLARA, and FORTY

15 NINERS STADIUM MANAGEMENT

COMPANY LLC

16
17 I attest that the original signature of the person whose electronic signature is shown above is
18 maintained by me, and that her concurrence in the filing of this document and attribution of her
19 signature was obtained.

20
21 /s/ Tanya E. Moore

Tanya E. Moore, Attorney for

Plaintiff, ANTHONY MARANON

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STIPULATION TO EXTEND TIME FOR PARTIES TO CONDUCT JOINT SITE INSPECTION;
[PROPOSED] ORDER

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IT IS HEREBY ORDERED that the last date for the Parties to conduct the Joint Site Inspection required both under the Scheduling Order and General Order 56 is continued to April 9, 2016. All other dates and deadlines triggered by the date of the Joint Site Inspection are continued accordingly.

Dated: January 25, 2016

Beth Labson Freeman
BETH LABSON FREEMAN
United States District Judge