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12 **UNITED STATES DISTRICT COURT**
13 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
14 **WESTERN DIVISION**

16 LOS ANGELES CATHOLIC WORKER,)
17 an unincorporated association; CANGRESS,)
18 a non-profit corporation; HARRY JAMES)
19 JONES, LOUIS GRADY, LLOYD)
20 HINKLE, WALTER SHOAF, individuals)
21 Plaintiffs,)

22 vs.)

23 LOS ANGELES DOWNTOWN)
24 INDUSTRIAL DISTRICT BUSINESS)
25 IMPROVEMENT DISTRICT, CENTRAL)
26 CITY EAST ASSOCIATION, INC., CITY)
27 OF LOS ANGELES; DOES 1-10)

28 Defendants.)

CASE NO.: CV14-7344 PSG (AJWx)

**JOINT STIPULATION OF THE
PARTIES TO CONTINUE DATES
SET IN THE COURT'S
SCHEDULING ORDER**

Complaint Served: October 6, 2014
Discovery Cut-Off: January 20, 2016
Current Trial Date: April 26, 2016

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2 **TO THE HONORABLE COURT AND TO THE CLERK OF THE COURT:**

3 Plaintiffs Los Angeles Catholic Worker, Cangress, Harry James Jones, Louis
4 Grady, Lloyd Hinkle, and Walter Shoaf, Defendants Los Angeles Downtown
5 Industrial District Business Improvement District, Central City East Association,
6 Inc., and Defendant City of Los Angeles through their respective counsel of record
7 hereby submit the following joint stipulation requesting a continuance of all dates
8 in the scheduling order for 90 days, as follows:

9 Pursuant to the Court's order, the parties have participated in good faith in
10 settlement conferences before Magistrate Woehrle on February 27, 2015, June 17,
11 2015, July 28, 2015, and November 20, 2015. The parties continue to engage in
12 settlement negotiations and are actively exchanging proposals. The parties believe
13 future talks will continue to be productive and are amenable to participating in
14 further sessions with Judge Woehrle.

15 Because these early settlement conferences indicated a potential for
16 resolution of this case, and because all parties are non-profits and government
17 entities, the parties have attempted to delay incurring significant litigation expenses
18 from discovery and motion practice while the parties have been actively engaged
19 in settlement negotiations.

20 The parties are now mutually engaging in discovery, and have exchanged
21 written discovery and have noticed several depositions.

22 The Central City East Association has identified a high volume of
23 responsive documents and Plaintiffs and the CCEA are conferring about how best
24 to inspect and copy such documents.

25 The City and Plaintiffs have met extensively regarding Defendants'
26 responses to Plaintiffs' Requests for Production and will likely require Court
27 intervention to resolve their disagreement; given the Magistrate Judge's scheduling
28 calendar, the parties will be unable to have a motion heard until shortly before the
current Discovery Cut-off.

1 The parties seek additional time to conduct discovery and engage in further
 2 settlement discussions prior to incurring costs associated with retaining and
 3 designating experts.

4 The parties have not yet sought any continuances or extensions of the dates
 5 set in the Court’s Scheduling Order.

6 Based on the foregoing, the parties hereby stipulate and request the Court
 7 continue the pretrial and trial deadlines as follows:

	Original Date	Requested Date
Discovery Cut-Off	January 20, 2016	April 19, 2016
Last Day to File Motions	February 9, 2016	May 9, 2016
Opening Expert Witness Disclosure	February 2, 2016	May 2, 2016
Rebuttal Expert Witness Disclosure	March 1, 2016	June 1, 2016
Expert Discovery Cut-Off	March 22, 2016	June 21, 2016
Final Pretrial Conference	April 11, 2016	July 11, 2016
Jury Trial (9:00 AM) (Estimated length: 7 days)	April 26, 2016	July 26, 2016

21 DATED: November 30, 2015

22
 23 **MICHAEL N. FEUER**, City Attorney
THOMAS H. PETERS, Chief Assistant City Attorney
 24 **RONALD S. WHITAKER**, Managing Assistant City Attorney

25 /s/ Elizabeth Fitzgerald

26 By: _____

27 **ELIZABETH T. FITZGERALD**
 Deputy City Attorney, *Attorneys for Defendant*
 28 **CITY OF LOS ANGELES**

1 DATED: November 30, 2015

2 **HILL FARRER & BURRILL LLP**

3
4 /s/ Kevin Brogan

5 By: _____

6 **KEVIN BROGAN**

7 *Attorneys for Defendants* **CENTRAL CITY EAST**
8 **ASSOCIATION, INC. and LOS ANGELES DOWNTOWN**
9 **INDUSTRIAL DISTRICT BUSINESS IMPROVEMENT**
10 **DISTRICT**

11 DATED: November 30, 2015

12 **LEGAL AID FOUNDATION OF LOS ANGELES**
13 **SCHONBRUN SEPLOW HARRIS & HOFFMAN LLP**

14
15 /s/ Catherine Sweetser

16 By: _____

17 **CATHERINE SWEETSER**

18 *Attorneys for Plaintiffs* **LOS ANGELES CATHOLIC**
19 **WORKER, CANGRESS, HARRY JAMES JONES, LOUIS**
20 **GRADY, LLOYD HINKLE, and WALTER SHOAF**
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