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15 Attorneys for Plaintiffs

16 UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION
18

19 LOS ANGELES CATHOLIC
20 WORKER, AN
21 UNINCORPORATED
22 ASSOCIATION; CANGRESS, A
23 NON-PROFIT CORPORATION;
24 HARRY JAMES JONES, LOUIS
25 GRADY, LLOYD HINKLE,
26 WALTER SHOAF, INDIVIDUALS,

27 Plaintiff(s),

28 vs.

LOS ANGELES DOWNTOWN
INDUSTRIAL DISTRICT
BUSINESS IMPROVEMENT
DISTRICT, CENTRAL CITY EAST
ASSOCIATION, INC., CITY OF
LOS ANGELES; DOES 1 -10,

Defendant(s).

CASE NO. CV 14-07344 PSG (AJW)

DISCOVERY MATTER

NOTICE OF MOTION AND MOTION
TO COMPEL, JOINT STIPULATION
TO COMPEL DISCOVERY;
DECLARATIONS OF CATHERINE
SWEETSER, SHAYLA MYERS,
ELIZABETH FITZGERALD

Hearing Date: January 11, 2016
Time: 10:00 A.M.

Discovery Cut-off: January 20, 2016
Trial: April 26, 2016, 9:00 a.m.

1 TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD

2 PLEASE TAKE NOTICE THAT on January 11, 2016 at 10:00 a.m. or as
3 soon thereafter as Counsel may be heard in Courtroom 690 of the United States
4 District Court, Central District of California, Roybal Courthouse located at 255
5 East Temple Street, Los Angeles, California, Plaintiffs will and do hereby move
6 this Court for an Order compelling further discovery responses and overruling
7 Defendant's objections to Plaintiff's Requests for Production propounded to
8 Defendant City of Los Angeles, Set One.

9 The Motion is based on this Notice, the Joint Stipulation of Parties, pursuant
10 to Local Rule 37-2.2, served and filed herewith, Declarations of Counsel and
11 supporting evidence, and such oral and documentary evidence as may be produced
12 at the hearing on the motion.

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14 Dated: December 7, 2015

Legal Aid Foundation of Los Angeles
Schonbrun Seplow Harris & Hoffman, LLP

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17 By: /s/ Shayla R. Myers
18 Shayla R. Myers
19 Attorneys for Plaintiffs
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