1 2 3 4 5 6 7 8	Barry A. Bradley, Esq., State Bar No. 125 bbradley@bglawyers.com Carol A. Humiston, Esq., State Bar No. 1 chumiston@bglawyers.com BRADLEY & GMELICH 700 North Brand Boulevard, 10th Floor Glendale, California 91203-1422 Telephone: (818) 243-5200 Facsimile: (818) 243-5266 Attorneys for Defendant DOWNTOWN LOS ANGELES PROPERTY OWNERS ASSOCIATION dba LA FASHION DISTRICT BUSINESS IMPROVEMENT DISTRICT	15592
9	INITED STATES	DISTRICT COURT
10	UNITEDSTATES	DISTRICT COURT
	CENTRAL DISTRICT OF CALI	FORNIA – WESTERN DIVISION
11		
12		I
13	AURELIANO SANTIAGO, an individual;	Case No. 2:15-CV-08444-BRO (Ex)
14	and UNION POPULOR DE	STIPULATION TO EXTEND THE
1-7	VENDEDORES AMBULANTES, an unincorporated association,	TIME FOR DEFENDANT DOWNTOWN LOS ANGELES
15		BUSINESS OWNERS
16	Plaintiff,	ASSOCIATION DBA LOS
10	vs.	ANGELES FASHION DISTRICT BUSINESS IMPROVEMENT
17	CITIL OF LOG ANGELTS TARREST	DISTRICT TO RESPOND TO THE
18	CITY OF LOS ANGELES, FASHION DISTRICT BUSINESS	COMPLAINT
19	IMPROVEMENT DISTRICT, DOWNTOWN LOS	[PROPOSED] ORDER EXTENDING TIME TO RESPOND
20	ANGELES PROPERTY OWNERS ASSOCIATION, INC., OFFICER	TO THE COMPLAINT
21	LINTON in her individual and official capacity, OFFICER OWEN, in her	(Assigned to the Hon, Beverly Reid O' Connel)
	individual and official capacity; DOES	
22	1-10,	Complaint Filed: 10/28/2015
23	Defendant.	Discovery Cutoff: None Set Motion Cutoff: None Set
24		Trial Date: None Set
	///	
25	///	
26		
27	///	
	///	
28		1
	STIPULATION TO EXTEND THE TIME FOR DEI	FENDANT DOWNTOWN LOS ANGELES BUSINESS

OWNERS ASSOCIATION DBA LOS ANGELES FASHION DISTRICT BUSINESS IMPROVEMENT DISTRICT TO RESPOND TO THE COMPLAINT

STIPU	LATION	TO	EXTEND	TIME

IT IS HEREBY STIPULATED BETWEEN PLAINTIFFS AND THE DEFENDANT DOWNTOWN LOS ANGELES PROPERTY OWNERS ASSOCIATION DBA LOS ANGELES FASHION DISTRICT BUSINESS IMPROVEMENT DISTRICT ("LA FD BID")AS FOLLOWS:

- 1. LA FD BID has been served with the Complaint, with a responsive pleading due on or about December 21, 2015;
- 2. LA FD BID has given plaintiffs notice of the intention, if necessary, to file a Motion to Dismiss;
- 3. The parties have agreed to attempt to resolve this matter, preferably with a neutral magistrate judge, judge, or mediator, before the necessity of filing a Motion to Dismiss or other formal responsive pleading is required;
- 4. The plaintiffs and the LA FD BID hereby stipulate, subject to Court approval, to extend the time for LA FD BID to file a responsive pleading, until January 25, 2016, in order to give the parties an opportunity to try to resolve the matter.

Dated: December 2015

BRADLEY & GMELICH

By:

Barry A. Bradley Carol A. Humiston

Attorneys for Cross-Defendant,
DOWNTOWN LOS ANGELES
PROPERTY OWNERS ASSOCIATION
dba LA FASHION DISTRICT BUSINESS
IMPROVEMENT DISTRICT

STIPULATION TO EXTEND THE TIME FOR DEFENDANT DOWNTOWN LOS ANGELES BUSINESS OWNERS ASSOCIATION DBA LOS ANGELES FASHION DISTRICT BUSINESS IMPROVEMENT DISTRICT TO RESPOND TO THE COMPLAINT

Dated: December 2/, 2015 NATIONAL LAWYERS GUILD - LA Attorneys for Plaintiff, AURELIANO SANTIAGO AND UNION POPULAR DE **VENTEDORES AMBULANTES**

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 700 North Brand Boulevard, 10th Floor, Glendale, California 91203.

On December 21, 2015, I served true copies of the following document(s) described as STIPULATION TO EXTEND THE TIME FOR DEFENDANT DOWNTOWN LOS ANGELES BUSINESS OWNERS ASSOCIATION DBA LOS ANGELES FASHION DISTRICT BUSINESS IMPROVEMENT DISTRICT TO RESPOND TO THE COMPLAINT on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Bradley & Gmelich's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on December 21, 2015, at Glendale, California.

Lorraine Jones

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28

SERVICE LIST

_	Aureliano Santiago, et al. vs. City of Los Angeles, et al.			
2	2:15-CV-08444			
3	Claudia Menjivar, Esq. Shayla R. Myers, Esq. Matthew G. Clark, Esq.	Peter Bibring, Esq. Michael Kaufman, Esq.		
5	Legal Aid Foundation of Los Angeles 7000 South Broadway	Jennifer L. Pasquarella, Esq. ACLU Foundation of Southern California 1313 West 8th Street		
6	Los Angeles, CA 90003 Telephone: 213-640-3831	Los Angeles, CA 90017 Telephone: 213-977-5232		
7	Facsimile: 213-640-3988 Attorney for Plaintiff, Aureliano Santiago and	Facsimile: 213-417-2232 Attorney for Plaintiff, Aureliano Santiago and		
8	Union Popular DE Ventedores Ambulantes	Union Popular DE Ventedores Ambulantes		
9	Colleen M. Mullen, Esq. Carol A. Sobel, Esq.	Cynthia Anderson-Barker, Esq. National Lawyers Guild - LA		
10	National Lawyers Guild - LA 3110 Main Street, Suite 210 Santa Monica, CA 90405	3435 Wilshire Boulevar, Suite 2910 Los Angeles, CA 90010 Telephone: 213-381-3246		
11	Telephone: 310-393-3055 Facsimile: 310-451-3858	Facsimile: 213-252-0091 Attorney for Plaintiff, Aureliano Santiago and		
12	Attorney for Plaintiff, Aureliano Santiago and Union Popular DE Ventedores Ambulantes	Union Popular DE Ventedores Ambulantes		
13 14	Catherine Sweetser, Esq. Paul L. Hoffman, Esq.	Ronald Whittaker, Esq.		
15	Schonbrun, Seplow, Harris & Hoffman 723 Ocean Front Walk	Eric Brown, Esq. L.A. City Attorney Office 200 N. Main Street, 9 th Floor		
16	Venice, CA 90291 Telephone: 310-396-0731	City Hall East, Room 916 Los Angeles, CA 90012		
17	Facsimile: 310-399-7040 Attorney for Plaintiff, Aureliano Santiago and Union Popular DE Ventedores Ambulantes	Telephone: 213-473-6848 Facsimile: 213.473.6818 Attorney for City of Los Angeles		
18	Chion I opatal DE Venicuoles Ambaiantes	Autorney for Cuy of Los Angeles		
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20				
21 22				
23				
24				
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