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9 **UNITED STATES DISTRICT COURT**  
10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
11 **WESTERN DIVISION**

12	LOS ANGELES CATHOLIC WORKER,	)	<b>CASE NO.: CV14-7344 PSG (AJWx)</b>
13	an unincorporated association; CANGRESS,	)	
14	a non-profit corporation; HARRY JAMES	)	<b>JOINT STIPULATION OF THE</b>
15	JONES, LOUIS GRADY, LLOYD	)	<b>PARTIES TO CONTINUE DATES</b>
16	HINKLE, WALTER SHOAF, individuals	)	<b>SET IN THE COURT'S</b>
17	Plaintiffs,	)	<b>SCHEDULLING ORDER AND</b>
18	vs.	)	<b>CONDUCT FURTHER</b>
19	LOS ANGELES DOWNTOWN	)	<b>SETTLEMENT DISCUSSIONS</b>
20	INDUSTRIAL DISTRICT BUSINESS	)	
21	IMPROVEMENT DISTRICT, CENTRAL	)	<b>Complaint Served: October 6, 2014</b>
22	CITY EAST ASSOCIATION, INC., CITY	)	<b>Discovery Cut-Off: February 19, 2016</b>
23	OF LOS ANGELES; DOES 1-10	)	<b>Current Trial Date: June 21, 2016</b>
24	Defendants.	)	

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

Plaintiffs Los Angeles Catholic Worker, Cangress, Harry James Jones, Louis Grady, Lloyd Hinkle, and Walter Shoaf, Defendants Los Angeles Downtown Industrial District Business Improvement District, Central City East Association, Inc., and Defendant City of Los Angeles through their respective counsel of record hereby submit the following joint stipulation requesting a continuance of the Discovery Cutoff, Last Day to File Motions, Expert Witness deadlines, and the Pretrial Conference for 14 days. Good cause exists for the 14 day extension of dates.

On February 2, 2016, the parties engaged in a settlement conference in front of Magistrate Judge Woehrle. The parties previously participated in settlement conferences on February 27, 2015, June 17, 2015, July 28, 2015, and November 20, 2015. The parties have also engaged in significant informal settlement discussions and continue to do so.

The settlement conferences with Judge Woehrle have been very productive, and based on the most recent settlement conference and subsequent discussions, parties are hopeful that further settlement discussions over the next two weeks may lead to resolution of many if not all matters in this litigation. The City of Los Angeles in particular has indicated that it needs additional time to consider Plaintiffs' proposal but that it will be responding shortly.

Although the parties have been diligent in conducting discovery, Plaintiffs still have a number of depositions to conduct in this litigation, which were previously scheduled for December and January. These depositions were postponed at the request of the City of Los Angeles and in consideration of the medical leave of the City's attorney. The outstanding depositions that Plaintiffs intend to take include a session with the Central City East Association's designee for Plaintiffs' Rule 30(b)(6) deposition, the deposition of the City of Los Angeles, for which the City has designated four individuals, and three additional deponents. These depositions have been scheduled for February 4, 5, 8, 9, and 10<sup>th</sup>. In

1 addition, the parties were conferring to schedule additional depositions the week of  
2 February 15.

3 Based on the settlement conference on February 2, 2016, the parties have  
4 agreed to postpone the depositions scheduled for February 4 and 5 and would like  
5 to continue the remaining depositions for a short time to avoid unnecessary fees  
6 and costs if settlement is in fact possible. Because of already-planned travel,  
7 CCEA's designee will not be available to sit for a deposition until March 1, 2016.  
8 Plaintiffs will need additional time to preserve their right to conduct discovery,  
9 including conducting the remaining depositions, while limiting the additional fees  
10 and costs.

11 A limited continuance of the discovery cutoff and other related dates by 14  
12 days will allow the parties to engage in settlement negotiations without incurring  
13 additional costs and attorneys' fees. This extension should not require any  
14 extension of the trial date.

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

	<b>Current Date</b>	<b>Requested Date</b>
17 Discovery Cut-Off	February 19, 2016	March 4, 2016
18 Last Day to File Motions	March 14, 2016	March 28, 2016
19 Opening Expert Witness 20 Disclosure	March 4, 2016	March 18, 2016
21 Rebuttal Expert Witness 22 Disclosure	April 4, 2016	April 18, 2016
23 Expert Discovery Cut-Off	April 25, 2016	May 9, 2016
24 Final Pretrial Conference	May 23, 2016	June 7, 2016
25 Jury Trial (9:00 AM) 26 (Estimated length: 7 days) 27 28	June 21, 2016	June 21, 2016

1 DATED: February 5, 2016

2 **MICHAEL N. FEUER**, City Attorney  
3 **THOMAS H. PETERS**, Chief Assistant City Attorney  
4 **RONALD S. WHITAKER**, Managing Assistant City Attorney

5 /s/ Ronald Whitaker

6 By: \_\_\_\_\_

7 **Ronald Whitaker**  
8 Managing Assistant City Attorney, *Attorneys for*  
9 *Defendant* **CITY OF LOS ANGELES**

10 DATED: February 5, 2016

11 **HILL FARRER & BURRILL LLP**

12 /s/ Kevin Brogan

13 By: \_\_\_\_\_

14 **KEVIN BROGAN**  
15 *Attorneys for Defendants* **CENTRAL CITY EAST**  
16 **ASSOCIATION, INC. and LOS ANGELES DOWNTOWN**  
17 **INDUSTRIAL DISTRICT BUSINESS IMPROVEMENT**  
18 **DISTRICT**

19 DATED: February 5, 2016

20 **LEGAL AID FOUNDATION OF LOS ANGELES**  
21 **SCHONBRUN SEPLOW HARRIS & HOFFMAN LLP**

22 /s/ Shayla Myers

23 By: \_\_\_\_\_

24 **SHAYLA MYERS**  
25 *Attorneys for Plaintiffs* **LOS ANGELES CATHOLIC**  
26 **WORKER, CANGRESS, HARRY JAMES JONES, LOUIS**  
27 **GRADY, LLOYD HINKLE, and WALTER SHOAF**  
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