

BRADLEY & GMELICH

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9 LOS ANGELES PROPERTY OWNERS  
10 ASSOCIATION dba LA FASHION  
11 DISTRICT BUSINESS IMPROVEMENT  
12 DISTRICT

13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

15 AURELIANO SANTIAGO, an  
16 individual;  
17 and UNION POPULOR DE  
18 VENEDORES AMBULANTES, an  
19 unincorporated association,

20 Plaintiff,

21 vs.

22 CITY OF LOS ANGELES, FASHION  
23 DISTRICT BUSINESS  
24 IMPROVEMENT  
25 DISTRICT, DOWNTOWN LOS  
26 ANGELES PROPERTY OWNERS  
27 ASSOCIATION, INC., OFFICER  
28 LINTON in her individual and official  
capacity; OFFICER OWEN, in her  
individual and official capacity; DOES  
1-10,

Defendant.

Case No. 2:15-CV-08444-BRO (Ex)

**STIPULATION TO EXTEND THE  
TIME FOR DEFENDANTS  
DOWNTOWN LOS ANGELES  
BUSINESS OWNERS  
ASSOCIATION DBA LOS  
ANGELES FASHION DISTRICT  
BUSINESS IMPROVEMENT  
DISTRICT AND THE CITY OF LOS  
ANGELES, OFFICER LINTON,  
AND OFFICER OWEN TO  
RESPOND TO THE COMPLAINT**

**[PROPOSED] ORDER  
EXTENDING TIME TO RESPOND  
TO THE COMPLAINT**

*(Assigned to the Hon. Beverly Reid O'Connell)*

Complaint Filed: 10/28/2015  
Discovery Cutoff: None Set  
Motion Cutoff: None Set  
Trial Date: None Set

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**STIPULATION 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”), THE CITY OF LOS ANGELES, OFFICER LINTON AND OFFICER OWEN (“CITY”) AS FOLLOWS:

1. LA FD BID has been served with the Complaint, has given notice of the intention to file a Motion to Dismiss, and this Court previously granted a first extension to respond to the Complaint until January 25, 2016, and a second extension to respond to the Complaint until February 25, 2016;

2. The CITY has been served with the Complaint, has given notice of the intention to file a Motion to Dismiss, and this Court previously granted a first extension to respond to the Complaint until February 25, 2016;

3. Plaintiffs’ counsel have indicated that in the event that the parties are unable to resolve this matter to their mutual satisfactions, a First Amended Complaint will be filed;

4. The parties held a settlement conference with Magistrate Judge Charles F. Eick on February 11, 2016, at 1:30 p.m., which was adjourned at the end of the day but it is expected will reconvene at a later date after the parties’ respective clients can be consulted;

5. The plaintiffs, the LA FD BID, and the CITY hereby stipulate, subject to Court approval, to extend the time for these defendants to file a responsive pleading, until April 11, 2016, in order to give the parties an opportunity to try to resolve the matter;

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1           6.     Magistrate Judge Eick authorized the parties to represent in this  
2 Stipulation that he concurs in the request for an extension to file a responsive  
3 pleading.

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5 Dated: February 12, 2016

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8 By:           /s/

Barry A. Bradley  
Carol A. Humiston

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11 Attorneys for Defendant DOWNTOWN  
12 LOS ANGELES PROPERTY OWNERS  
13 ASSOCIATION dba LA FASHION  
14 DISTRICT BUSINESS IMPROVEMENT  
15 DISTRICT

16 Dated: February 12, 2016

LOS ANGELES CITY ATTORNEY'S OFFICE

17  
18 By:           /s/

Eric Brown

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20 Attorneys for Defendants CITY OF LOS  
21 ANGELES, OFFICER LINTON AND  
22 OFFICER OWEN  
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