1	Fernando Gaytan (SBN 224712) fgaytan@lafla.org			
2	Paul J. Estuar (SBN 167764) pestuar@lafla.org Shayla R. Myers (SBN 264054) smyers@lafla.org			
3	LEGAL AID FOUNDATION OF LOS	· · · · · · · · · · · · · · · · · · ·		
4	7000 S. Broadway			
5	Los Angeles, CA 90003 Tel: (213) 640-3831			
6	Fax: (213) 640-3988			
7	PAUL L. HOFFMAN (No. 071244)			
8	CATHERINE SWEETSER (No. 271142)			
9	Schonbrun Seplow Harris & Hoffman LLP 723 Ocean Front Walk			
10	Venice, CA 90291			
11	Telephone: (310) 396-0731 Facsimile: (310) 399-7040			
12	Email: hoffpaul@aol.com Email: catherine.sdshhh@gmail.com			
13	Linair. catherine.sushini@gman.com			
14	UNITED STATES DISTRICT COURT			
15	FOR THE CENTRAL DISTRICT OF CALIFORNIA			
16	WESTERN DIVISION			
17	LOS ANGELES CATHOLIC) CASE NO.: CV14-7344 PSG (AJWx)		
18	WORKER, et al.)		
19	D1 : .:00	STIPULATION TO CONTINUE DATES IN CASE		
20	Plaintiffs,) DATES IN CASE		
		\{		
21	VS.	Complaint Served: October 6, 2014		
21 22		Complaint Served: October 6, 2014 Discovery Cut-Off: April 4, 2016		
	vs. LOS ANGELES DOWNTOWN INDUSTRIAL DISTRICT BUSINESS	Discovery Cut-Off: April 4, 2016		
22	LOS ANGELES DOWNTOWN	· ·		
22 23	LOS ANGELES DOWNTOWN INDUSTRIAL DISTRICT BUSINESS IMPROVEMENT DISTRICT, et al.	Discovery Cut-Off: April 4, 2016		
22 23 24	LOS ANGELES DOWNTOWN INDUSTRIAL DISTRICT BUSINESS	Discovery Cut-Off: April 4, 2016		
22 23 24 25	LOS ANGELES DOWNTOWN INDUSTRIAL DISTRICT BUSINESS IMPROVEMENT DISTRICT, et al.	Discovery Cut-Off: April 4, 2016		

1 2

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

3

4 || 5 || 5

6

7

9

10

11

12

1314

15

1617

18

1920

21

2223

2425

2627

28

Defendants City of Los Angeles, Los Angeles Downtown Industrial District Business Improvement District, Central City East Association, Inc., and Plaintiffs Los Angeles Catholic Worker, Cangress, Harry James Jones, Louis Grady, Lloyd Hinkle, and Walter Shoaf, through their respective counsel of record hereby stipulate to continue all pretrial dates by 60 days and the pretrial conference and the trial date by approximately 75 days, as follows:

Whereas, the parties have a further mediation scheduled for April 5, 2016;

Whereas, the court on March 24, 2016 recognized that the City of Los Angeles has not yet provided the many documents ordered produced on January 11, 2016, and set the matter for further hearing on April 5, 2016;

Whereas, the court extended the date of that hearing on whether to hold the City of Los Angeles in contempt to May 4, 2016 to allow parties to attend a mediation on April 5, 2016;

Whereas, the City of Los Angeles has been ordered to provide all documents responsive to Plaintiffs' requests as soon as possible but has not yet done so;

Whereas, Plaintiffs have been diligently working to obtain all documents and complete discovery;

Whereas Plaintiffs have been unable to complete previously-scheduled depositions because the City has failed to produce documents the Court has ordered it to produce;

Whereas, the City of Los Angeles will make certain deponents available for second sessions of their depositions after production is complete;

Whereas the parties have agreed to postpone depositions until the City has produced responsive documents;

Whereas Plaintiffs' Counsel has a trial on October 25, 2016;

Whereas Defense Counsel for Defendant Los Angeles Downtown Industrial District and the Central City East Association has a vacation that will take him out of the country in September 2016.

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

		Current Date	Requested Date
	Discovery Cut-Off	April 4, 2016	June 6, 2016
	Last Day to File Motions	April 28, 2016	July 5, 2016
	Opening Expert Witness	April 18, 2016	June 17, 2016
	Disclosure		
•	Rebuttal Expert Witness	May 18, 2016	July 18, 2016
	Disclosure		
	Expert Discovery Cut-Off	June 9, 2016	August 8, 2016
	Final Pretrial Conference	July 7, 2016	September 29, 2016
	Jury Trial (9:00 AM)	July 19, 2016	October 4, 2016
	(Estimated length: 7 days)		

DATED: April 1, 2016

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

By: /s/ THOMAS H. PETERS

Attorneys for Defendant CITY OF LOS ANGELES

	1		
1	DATED: April 1, 2016		
2	HILL FARRER & BURRILL LLP		
3	HILL FARRER & BURKILL LLP		
4			
5	By:/s KEVIN BROGAN		
6	Attorneys for Defendants CENTRAL CITY EAST		
7	ASSOCIATION, INC. and LOS ANGELES DOWNTOWN		
8	INDUSTRIAL DISTRICT BUSINESS IMPROVEMENT DISTRICT		
9			
10			
11	DATED: April 1, 2016		
12	LEGAL AID FOUNDATION OF LOS ANGELES		
13	SCHONBRUN SEPLOW HARRIS & HOFFMAN LLP		
14			
15	By:/s/		
16	SHAYLA MYERS		
17	Attorneys for Plaintiffs LOS ANGELES CATHOLIC WORKER, CANGRESS, HARRY JAMES JONES, LOUIS		
18	GRADY, LLOYD HINKLE, and WALTER SHOAF		
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			