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

LOS ANGELES CATHOLIC  
WORKER, et al.

Plaintiffs,

vs.

LOS ANGELES DOWNTOWN  
INDUSTRIAL DISTRICT BUSINESS  
IMPROVEMENT DISTRICT, et al.

Defendants.

**CASE NO.: CV14-7344 PSG (AJWx)**

**STIPULATION TO CONTINUE  
DATES IN CASE**

**Complaint Served: October 6, 2014**

**Discovery Cut-Off: April 4, 2016**

**Current Trial Date: July 19, 2016**

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

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

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

10 Whereas, the court on March 24, 2016 recognized that the City of Los  
11 Angeles has not yet provided the many documents ordered produced on January  
12 11, 2016, and set the matter for further hearing on April 5, 2016;

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

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

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

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

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

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

27 Whereas Plaintiffs' Counsel has a trial on October 25, 2016;  
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1 DATED: April 1, 2016

2 **HILL FARRER & BURRILL LLP**

3  
4 By: \_\_\_\_\_/s/\_\_\_\_\_

5 **KEVIN BROGAN**

6 *Attorneys for Defendants* **CENTRAL CITY EAST**  
7 **ASSOCIATION, INC. and LOS ANGELES DOWNTOWN**  
8 **INDUSTRIAL DISTRICT BUSINESS IMPROVEMENT**  
9 **DISTRICT**

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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**  
18 **WORKER, CANGRESS, HARRY JAMES JONES, LOUIS**  
19 **GRADY, LLOYD HINKLE, and WALTER SHOAF**  
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