bbradley@bglawyers.com Carol A. Humiston, Esq., State Bar No. 115592 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 8 9

#### UNITED STATES DISTRICT COURT

#### CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

AURELIANO SANTIAGO, an individual; and UNION POPULOR DE VENDEDORES AMBULANTES, an unincorporated association,

CITY OF LOS ANGELES, FASHION

capacity; OFFICER OWEN, in her

individual and official capacity; DOES

Defendant.

Plaintiff,

VS.

DISTRICT BUSINESS

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DISTRICT, DOWNTOWN LOS
ANGELES PROPERTY OWNERS

22 ASSOCIATION, INC., OFFICER LINTON in her individual and official

1-10,

III

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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' Connel)

Complaint Filed: 10/28/2015

2:15-CV-08444- BRO (Ex)

### 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, a second extension to respond to the Complaint until February 25, 2016, and a third extension to respond to the Complaint to April 11, 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, and a second extension to respond to the Complaint until April 11, 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 the parties agreed to further settlement negotiations before Magistrate Judge Eick;
- 5. The first available date for all parties to continue the settlement conference with Magistrate Judge Eick was April 18, 2016, but due to a trial that was unexpectedly not continued on that date, the parties are attempting to reschedule with Judge Eick for late April to mid-May;
- 6. 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

1	pleading, until June 1, 2016, in order to give the parties an opportunity to try to		
2	resolve the matter.		
3	Dated: April <u>7</u> , 2016	Bradley & Gmelich	
4			
5			
6		By: /s/ Carol Humiston	
7		Barry A. Bradley Carol A. Humiston	
8		Attorneys for Defendant DOWNTOWN	
9		LOS ANGELES PROPERTY OWNERS ASSOCIATION dba LA FASHION	
10		DISTRICT BUSINESS IMPROVEMENT	
11		DISTRICT	
12			
13	Dated: April <u>7</u> , 2016	Los Angeles City Attorney's Office	
14			
15		By: /s/ Eric Brown	
16		By: /s/ Eric Brown Eric Brown	
17		Attorneys for Defendants CITY OF LOS	
18		ANGELES, OFFICER LINTON AND OFFICER OWEN	
19			
20	Dated: April <u>7</u> , 2016	NATIONAL LAWYERS GUILD - LA	
21			
22		_	
23		By: /s/ Carol A. Sobel Carol A. Sobel	
24		Attorneys for Plaintiff AURELIANO	
25		SANTIAGO AND UNION POPULAR DE	
26		VENTEDORES AMBULANTES	
27	All parties have authorized the use of their electronic signatures for this document.		
28			
		3 2:15-CV-08444- BRO (Ex	

STIPULATION TO EXTEND THE TIME FOR DEFENDANTS TO RESPOND TO THE COMPLAINT

#### 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 April 7, 2016, I served true copies of the following document(s) described as 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 on the interested parties in this action as follows:

#### SEE ATTACHED SERVICE LIST

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on April 7, 2016, at Glendale, California.

Patricia J. Morse

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# SERVICE LIST

*	Aureliano Santiago, et al. vs. City of Los Angeles, et al.		
2	2:15-CV-08444		
3	Claudia Menjivar, Esq. Legal Aid Foundation of Los Angeles	Peter Bibring, Esq. ACLU Foundation of Southern California	
4	7000 South Broadway	1313 West 8th Street	
5	Los Angeles, CA 90003 Telephone: 213-640-3831 Facsimile: 213-640-3988	Los Angeles, CA 90017 Telephone: 213-977-5232 Facsimile: 213-417-2232	
6	Attorney for Plaintiff, Aureliano Santiago and	Attorney for Plaintiff, Aureliano Santiago and	
7	Union Popular DE Ventedores Ambulantes	Union Popular DE Ventedores Ambulantes	
8	Colleen M. Mullen, Esq. National Lawyers Guild - LA	Cynthia Anderson-Barker, Esq. National Lawyers Guild - LA	
9	3110 Main Street, Suite 210 Santa Monica, CA 90405	3435 Wilshire Boulevar, Suite 2910 Los Angeles, CA 90010	
	Telephone: 310-393-3055	Telephone: 213-381-3246	
10	Facsimile: 310-451-3858 Attorney for Plaintiff, Aureliano Santiago and	Facsimile: 213-252-0091 Attorney for Plaintiff, Aureliano Santiago and	
11	Union Popular DE Ventedores Ambulantes	Union Popular DE Ventedores Ambulantes	
12	Catherine Sweetser, Esq.	Ronald Whitaker, Esq. Eric Brown, Esq.	
13	Schonbrun, Seplow, Harris & Hoffman 723 Ocean Front Walk	L.A. City Attorney Office 200 N. Main Street, 9 <sup>th</sup> Floor	
14	Venice, CA 90291   Telephone: 310-396-0731	200 N. Main Street, 9" Floor City Hall East, Room 916	
15	Facsimile: 310-399-7040 Attorney for Plaintiff, Aureliano Santiago and	Los Angeles, CA 90012 Telephone: 213-473-6848	
16	Union Popular DE Ventedores Ambulantes	Facsimile: 213.473.6818 Attorney for City of Los Angeles	
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