

BRADLEY & GMELICH

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LOS ANGELES PROPERTY OWNERS
7 ASSOCIATION dba LA FASHION
DISTRICT BUSINESS IMPROVEMENT
8 DISTRICT

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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

12 AURELIANO SANTIAGO, an
13 individual;
14 and UNION POPULOR DE
VENEDORES AMBULANTES, an
15 unincorporated association,

16 Plaintiff,

17 vs.

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19 CITY OF LOS ANGELES, FASHION
DISTRICT BUSINESS
20 IMPROVEMENT
DISTRICT, DOWNTOWN LOS
21 ANGELES PROPERTY OWNERS
ASSOCIATION, INC., OFFICER
22 LINTON in her individual and official
capacity; OFFICER OWEN, in her
23 individual and official capacity; DOES
1-10,

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

**FIFTH JOINT 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 The CITY has been served with the Complaint, and filed a Motion to Dismiss that has since been withdrawn to allow further settlement discussions to take place in this action;

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 have made substantial progress in settlement discussions: they have held two settlement conferences with Magistrate Judge Charles F. Eick and have scheduled a third settlement conference for June 22, 2016;

5. On April 11, 2016, the Court granted the Fourth Stipulation filed by the parties to extend the time to file responsive pleadings to the Complaint, with the current extension set to expire on June 1, 2016 (Docket #28);

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 pleading, until July 18, 2016, in order to give the parties an opportunity to try to resolve the matter;

BRADLEY & GMELICH

1 Dated: May __, 2016

BRADLEY & GMELICH

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By: _____ /s/

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Barry A. Bradley

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Carol A. Humiston

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Attorneys for Defendant DOWNTOWN
LOS ANGELES PROPERTY OWNERS

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ASSOCIATION dba LA FASHION

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DISTRICT BUSINESS IMPROVEMENT
DISTRICT

8

9 Dated: May __, 2016

LOS ANGELES CITY ATTORNEY'S OFFICE

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By: _____ /s/

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Eric Brown

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Attorneys for Defendants CITY OF LOS
ANGELES, OFFICER LINTON AND

13

OFFICER OWEN

14 Dated: May __, 2016

NATIONAL LAWYERS GUILD - LA

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By: _____ /s/

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Carol A. Sobel

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Attorneys for Plaintiff AURELIANO
SANTIAGO AND UNION POPULAR DE
VENTEDORES AMBULANTES

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20 All parties have authorized the use of their electronic signatures for this document.

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