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

13 AURELIANO SANTIAGO, et al.,
 14 Plaintiffs,
 15 vs.
 16 CITY OF LOS ANGELES, et al.,
 17 Defendants.
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) Case No. 2:15-cv-08444-BRO-E

) **JOINT STIPULATION TO EXTEND
 THE TIME FOR DEFENDANTS CITY
 OF LOS ANGELES AND OFFICER
 LINTON TO RESPOND TO THE FIRST
 AMENDED COMPLAINT**

) **ACTION FILED: OCT. 28, 2015**

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1 Plaintiffs and Defendants City of Los Angeles and Officer Linton (“City
2 Defendants”), through their respective counsel, request that the Court grant an
3 extension of time for City Defendants to respond to the First Amended Complaint
4 in this action. Over the past several months, the parties have engaged in settlement
5 discussions with the assistance of Judge Eick, beginning shortly after the action
6 was filed. They have requested, and the Court has granted, six extensions of time
7 to respond to the Complaint to permit these settlement discussions to continue. To
8 date, the parties have been unable to resolve their disputes, despite their good faith
9 efforts to do so.

10 Plaintiffs filed a First Amended Complaint on September 9, 2016. Counsel
11 for the City Defendants recently notified Plaintiffs’ counsel that the City
12 Defendants intend to file a motion to dismiss prior to the current date for
13 responsive documents, September 23, 2016. During a telephonic meet and confer
14 on September 19, 2016, counsel for the City Defendants and Plaintiffs’ counsel
15 agreed to a briefing schedule on the motion. Under the agreed-upon schedule: the
16 City Defendants will file their motion to dismiss no later than October 11, 2016;
17 Plaintiffs’ opposition will be filed by October 24, 2016; the City Defendant’s reply
18 will be filed by November 7, 2016; and the hearing will be noticed for November
19 21, 2016. The Plaintiffs and City Defendants negotiated this schedule to
20 accommodate counsels’ pre-existing commitments and deadlines in other matters.

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1 For the foregoing reasons, the parties submit this stipulation and respectfully
2 request that the Court extend the time for filing initial responsive documents to and
3 through October 11, 2016.

4 Dated: September 22, 2016

Respectfully submitted,
ACLU OF SOUTHERN CALIFORNIA

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6

By: /s/ Michael Kaufman
Attorneys for Plaintiffs

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8 Dated: September 22, 2016

MICHAEL N. FEUER, City Attorney
ERIC BROWN, Deputy City Attorney

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By: /s/ Eric Brown
Attorneys for Defendants City of Los
Angeles and Officers Linton

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PROOF OF SERVICE

I am over the age of 18 and not a party to this case. My business address is: 1851 East First Street, Suite 450, Santa Ana, CA 92705.

A true and correct copy of the foregoing document(s) entitled (*specify*):

**-JOINT STIPULATION TO EXTEND THE TIME FOR DEFENDANTS CITY OF LOS ANGELES AND OFFICER LINTON TO RESPOND TO THE FIRST AMENDED COMPLAINT
-[PROPOSED] ORDER RE JOINT STIPULATION TO EXTEND THE TIME FOR DEFENDANTS CITY OF LOS ANGELES AND OFFICER LINTON TO RESPOND TO THE FIRST AMENDED COMPLAINT**

TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to Local Rule 5-3.2.1, the foregoing document will be served by the court via NEF and hyperlink to the document. On September 22, 2016, I checked the CM/ECF docket for this case and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

9/22/16 Michelle Ochoa

Date Printed Name


Signature