| 1 2 | Donald E. J. Kilmer, Jr. [SBN: 179986]<br>LAW OFFICES OF DONALD KILMER<br>1645 Willow Street, Suite 150<br>San Jose, California 95125<br>Voice: (408) 264-8489<br>Fax: (408) 264-8487<br>E-Mail: Don@DKLawOffice.com |   |  |
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| •   |  |   |  |
| 5   | Attorneys for Plaintiffs   |   |  |
| 6   |  |   |  |
| 7   |  |   |  |
| 8   |  | S DISTRICT COURT                                |  |
| 9   | FOR THE NORTHERN DISTRICT OF CALIFORNIA<br>SAN JOSE COURTHOUSE   280 S. 1 <sup>ST</sup> STREET, SAN JOSE, CA 95113   |   |  |
| 10  |  |   |  |
| 11  | TODI DODDIGING MIND GDGOND   | Case No.: 5:15-CV-03698                         |  |
| 12  | LORI RODRIGUEZ, THE SECOND AMENDMENT FOUNDATION,   |   |  |
| 13  | INC., and THE CALGUNS<br>FOUNDATION, INC.,   | STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT |  |
| 14  | , ,  | CONFERENCE, ADR<br>CERTIFICATION AND RULE 26(f) |  |
| 15  | Plaintiffs,  | REPORT  |  |
| 16  | vs.  |   |  |
| 17  | CITY OF SAN JOSE, CITY OF SAN<br>JOSE POLICE DEPARTMENT,<br>OFFICER STEVEN VALENTINE   |   |  |
| 18  |  |   |  |
| 19  | and DOES 1 TO 20,  |   |  |
| 20  | Defendants.  |   |  |
| 21  |  |   |  |
| 22  | The parties, by and through undersigned counsel, hereby agree as follows:  |   |  |
| 23  | 1. That the Defendants' Waiver of Service of Process signed on September 28,   |   |  |
| 24  | 2015 and was filed on October 21, 2015.  |   |  |
| 25  | 2. Defendants' Response is due November 27, 2015.  |   |  |
| 26  | 3. The parties have been diligently e  | engaged in discussing case management,          |  |
| 27  | discovery and Alternative Dispute Resolution since the City received notice of the case in late August of 2015   |   |  |
| 28  |  |   |  |

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| 1  | 4. The parties believe that these self-directed discussions are helpful to keeping |   |  |
|----|--|---|--|
| 2  | litigation costs down and minimizing judicial resources. Therefore they            |   |  |
| 3  | mutually request the following orders:   |   |  |
| 4  | a. That the Case Management Conference be continued to the first                   |   |  |
| 5  | available date in February, 2016.  |   |  |
| 6  | b. That the deadlines for filing ADR Certification and Rule 26(f) Report           |   |  |
| 7  | be continued to January 20, 2016.  |   |  |
| 8  | c. That the Defendants   | 'Response shall be filed on or before February 5, |  |
| 9  | 2016.  |   |  |
| 10 | SO STIPULATED.   |   |  |
| 11 | Date: October 21, 2015   | Date: October 21, 2015                            |  |
| 12 |  |   |  |
| 13 | /s/ Mark Vanni   | /s/ Donald Kilmer                                 |  |
| 14 | For Defendants   | For Plaintiffs                                    |  |
| 15 |  |   |  |
| 16 | <u>ORDER</u>   |   |  |
| 17 | Good cause having been shown, the Initial Case Management Conference in            |   |  |
| 18 | this matter is continued to:   | , at (am/pm).                                     |  |
| 19 | ADR Certification and Rule   | e 26(f) Reports shall be due January 20, 2016.    |  |
| 20 | SO ORDERED.  |   |  |
| 21 |  |   |  |
| 22 |  |   |  |
| 23 |  | United States District Court Judge                |  |
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