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[Case caption follow on next page]

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

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NATIONAL ASSOCIATION FOR GUN RIGHTS, INC., a non-profit corporation, and **MARK SIKES**, an individual,

And

HOWARD JARVIS TAXPAYERS ASSN., a nonprofit corporation, **SILICON VALLEY TAXPAYERS ASSN.**, a nonprofit corporation, **SILICON VALLEY PUBLIC ACCOUNTABILITY FOUNDATION**, a nonprofit corporation, **JIM BARRY**, an individual, and **GEORGE ARRINGTON**, an individual,

Plaintiffs,

v.

CITY OF SAN JOSE, a public entity, **JENNIFER MAGUIRE**, in her official capacity as City Manager of the City of San Jose, and the **CITY OF SAN JOSE CITY COUNCIL**,

Defendants.

Case No. 5:22-cv-00501-BLF

JOINT STIPULATION AND PROPOSED ORDER (1) EXTENDING TIME TO RESPOND TO DEFENDANTS' MOTION TO DISMISS (ECF # 95); AND (2) JOINT REQUEST FOR A NEW CASE MANAGEMENT SCHEDULING ORDER

Courtroom: 3-5th Floor
Judge: Honorable Beth Labson Freeman

Complaint Filed: January 25, 2022



1 SUBJECT TO THE COURT’S APPROVAL, and pursuant to L.R. 6-2, the Plaintiffs—National
2 Association For Gun Rights, Inc., Mark Sikes, Howard Jarvis Taxpayers Assn., Silicon Valley
3 Taxpayers Assn., Silicon Valley Public Accountability Foundation, Jim Barry, and George Arrington—
4 and Defendants—City Of San Jose, Jennifer Maguire, in her official capacity as City Manager of the
5 City of San Jose, and the City Of San Jose City Council—hereby stipulate and agree that the Plaintiffs’
6 deadline to respond to Defendants’ motion to dismiss (ECF #95) will be March 16, 2023, and the
7 Defendants’ deadline to reply will be March 30, 2023. This is a two-week extension for both responses
8 and replies.

9 The parties also stipulate, agree, and request that the Court vacate each of the future dates set
10 forth in the Case Management Scheduling Order (ECF # 58), which was entered before consolidation.
11 The parties further request that the Court set a Case Management Conference after the Court rules on
12 Defendants’ currently pending Motion to Dismiss the Amended Consolidated Complaint (ECF # 95,
13 96), for the purpose of setting a new trial date and all other attendant dates thereto.

14 [Signatures on Next Page]
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Dated: February 28, 2023

DHILLON LAW GROUP INC.

By: /s/ Harmeet K. Dhillon
Harmeet K. Dhillon
Michael A. Columbo
Mark P. Meuser
David A. Warrington (pro hac vice)

Dated: February 28, 2023

HOWARD JARVIS TAXPAYERS FOUNDATION

By: /s/ Timothy A. Bittle
Jonathan M. Coupal
Timothy A. Bittle
Laura E. Dougherty

Dated: February 28, 2023

COTCHETT, PITRE & McCARTHY, LLP

By: /s/ Tamarah P. Prevost
Joseph W. Cotchett
Tamarah P. Prevost
Andrew F. Kirtley

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DECLARATION OF MICHAEL A. COLUMBO

I, Michael A. Columbo, declare that counsel have met and conferred about this stipulation. That counsel whose signatures are reflected on the preceding page gave approval to this stipulation.

Pursuant to Local Rule 6-2, I further declare that the reasons for the requested enlargement of time have to do with accommodating the press of business on counsel, that there have been no previous time modifications in this case, and that I would describe the effect of the time modification requested here as being minimal.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 28, 2023.

/s/ Michael A. Columbo

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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

NATIONAL ASSOCIATION FOR GUN RIGHTS, INC., a non-profit corporation, and **MARK SIKES**, an individual,

And

HOWARD JARVIS TAXPAYERS ASSN., a nonprofit corporation, **SILICON VALLEY TAXPAYERS ASSN.**, a nonprofit corporation, **SILICON VALLEY PUBLIC ACCOUNTABILITY FOUNDATION**, a nonprofit corporation, **JIM BARRY**, an individual, and **GEORGE ARRINGTON**, an individual,

Plaintiffs,

v.

CITY OF SAN JOSE, a public entity, **JENNIFER MAGUIRE**, in her official capacity as City Manager of the City of San Jose, and the **CITY OF SAN JOSE CITY COUNCIL**,

Defendants.

Case No. 5:22-cv-00501-BLF

[PROPOSED] ORDER (1) EXTENDING TIME TO RESPOND TO DEFENDANTS' MOTION TO DISMISS (ECF # 95); AND (2) GRANTING JOINT REQUEST FOR A NEW CASE MANAGEMENT SCHEDULING ORDER



1 SUBJECT TO THE COURT’S APPROVAL, and pursuant to L.R. 6-2, the Plaintiffs—National
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12 Defendants’ currently pending Motion to Dismiss the Amended Consolidated Complaint (ECF # 95,
13 96), for the purpose of setting a new trial date and all other attendant dates thereto.

14 PURSUANT TO THE STIPULATION, IT IS SO ORDERED, the Court sets a Case
15 Management Conference for _____.

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17 DATED: _____

18 Hon. Beth Labson Freeman
19 United States District Judge
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