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[Counsel identified on signature pages]

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

NATIONAL URBAN LEAGUE, et al.,

Plaintiffs,

v.

WYNN COGGINS, et al.,

Defendants.

CASE NO. 5:20-cv-05799-LHK
**STIPULATION AND [PROPOSED]
ORDER**

1 Pursuant to Civil Local Rules 6-2 and 7-12, the parties to this action, by their respective
2 counsel, respectfully submit the following Joint Stipulation, and respectfully request that the
3 Court issue the following order:

4 WHEREAS, on February 3, 2021, the Court entered the parties' Stipulation and Order
5 ("February 3 Stipulation and Order"), ECF No. 467;

6 WHEREAS, the February 3 Stipulation and Order provided for a 21-day stay of this case,
7 beginning February 5, 2021 and ending February 26, 2021;

8 WHEREAS, the parties have continued to engage in good-faith discussions concerning
9 the potential resolution of this case, and the parties have reached agreement on key portions of
10 Plaintiffs' claims;

11 WHEREAS, the parties believe that the public interest would be served by staying all
12 proceedings in this litigation for 21 additional days while the parties continue their discussions
13 concerning the potential resolution of this case.

14 THE PARTIES JOINTLY STIPULATE, AND RESPECTFULLY REQUEST THAT
15 THE COURT ORDER, AS FOLLOWS:

16 1. That the Court enter a 21-day stay of this case, effective beginning February 26, 2021
17 and ending on March 19, 2021, with any deadlines currently due February 26, 2021 becoming
18 due on March 19, 2021, and all other deadlines commensurately shifted;

19 2. That the Court enter a 21-day stay of proceedings related to Plaintiffs' Renewed
20 Motion to Compel, *see* ECF Nos. 462, 463, 464, to be coextensive with the requested stay of the
21 case as a whole;

22 3. That the Court continue the Case Management Conference currently scheduled for
23 Friday, February 26, 2021, until Friday, March 19, 2021;

24 4. That the parties file a Joint Case Management Statement on March 17, 2021, for a
25 Further Case Management Conference on March 19, 2021 at 10:00 a.m. PT;

26 5. That, should the parties not reach earlier resolution, the case shall restart on March 19,
27 2021 under the same schedule currently in place; and
28

1 6. Defendants will not, on the grounds of any stay, resist or challenge Plaintiffs taking
2 any of the depositions currently noticed or producing any of the documents and materials
3 Defendants currently are obligated to produce, but Defendants may assert the objections that they
4 would have had in the normal course.

5
6 Dated: February 24, 2021

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ATTESTATION

I, Sadik Huseny, am the ECF user whose user ID and password authorized the filing of this document. Under Civil L.R. 5-1(i)(3), I attest that all signatories to this document have concurred in this filing.

Dated: February 24, 2021

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[PROPOSED] ORDER

The stipulation is GRANTED.

PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.

DATED: _____

Lucy H. Koh
United States District Judge