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Attorneys for Plaintiff
JILLIAN PIERCE, on behalf of herself
and all others similarly situated,

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

JILLIAN PIERCE, on behalf of herself and all others similarly situated,

Plaintiff,

vs.

COUNTY OF SAN FRANCISCO, San Francisco Sheriff's Department Sheriff VICKI HENNESSY, San Francisco Sheriff's Department Chief Deputy MICHELE FISHER, and County of San Francisco employees DOES 1-50, Jointly and Severally,

Defendant(s).

Case No.: 19-cv-07659-JSW

STIPULATION AND [~~PROPOSED~~] ORDER TO EXTEND BRIEFING SCHEDULE FOR MOTION TO DISMISS AND TO CONTINUE CASE MANAGEMENT CONFERENCE AND RELATED DATES

Judge: The Honorable Judge Jeffrey S. White
Hearing date: May 22, 2020
Time: 9:00 a.m.

Under Local Civil Rule 7-12, the parties stipulate to the following:

1. On April 3, 2020, Defendants filed a motion to dismiss the operative complaint. (ECF No. 21.)

2. Plaintiff's opposition to Defendants' motion, which is due on April 17, 2020, is now due on May 1, 2020.

3. Defendants' reply brief, which is due on April 24, 2020, is now due on May 15, 2020.

4. The hearing on Defendants' Motion to Dismiss currently set for May 22, 2020 is continued to June 5, 2020 at 9 a.m.

5. Upon the Court's availability, the parties further propose continuing the Case Management Conference currently set for June 19, 2020 (ECF No. 20) to July 17, 2020 at 11:00 a.m. in order to resolve Defendants' Motion to Dismiss before any CMC and Rule 26 requirements become due.

6. Accordingly, the last day to meet and confer re: initial disclosures, early settlement, ADR process selection; and discovery plan currently set for March 31, 2020 (ECF No. 11) is continued to July 3, 2020.

7. Likewise, the last day to file Rule 26(f) Report, complete initial disclosures or state objections in Rule 26(f) Report and file Case Management Statement per Standing Order re Contents of Joint Case Management Statement currently set for June 12, 2020 (ECF No. 20) is continued to July 10, 2020.

8. Good cause showing, plaintiffs: Defendant's motion raises serious issues that require extensive research. Siegel, Yee, Brunner & Mehta represent individuals who are currently incarcerated at Santa Rita Jail and in homeless encampments that are affected by the covid-19 pandemic and require immediate attention. The firm's office is currently closed, and its attorneys are working from home pursuant to the current shelter-in-place orders while trying to navigate the administrative processes to talk to

clients currently housed in San Francisco Jail who are also members of this action's proposed class via video conferencing.

9. Defendants' Statement of good cause: On March 16, 2020, the Health Officer of the City and County of San Francisco issued an order directing all individuals living in the County to shelter at their place of residence except for certain essential services. On March 20, 2020, California Governor Gavin Newson issued Executive Order N-33-20, imposing similar restrictions state-wide for an indefinite period of time. On March 31, 2020, the Health Officer of the City and County of San Francisc extended the shelter in place order until May 3, 2020. Violation of the Health Officer's Shelter in Place order is a misdemeanor punishable by fine, imprisonment, or both. California Health and Safety Code § 120295 et seq.; Calif. Pen. C. §§ 69, 148(a)(1). San Francisco Admin. C. § 7.17(b). The City's essential government workers, include the individual defendants in this case, are working tirelessly to reduce the risks to the public of this unprecedented pandemic, including risks to the jail population.

In recognition of the Health Officer of the City and County of San Francisco's order, on March 16, 2020, San Francisco City Attorney Dennis Herrera directed the City Attorney's Office to be staffed only with employees performing essential government services. Some other employees were asked to work remotely to the extent possible, including counsel of record in this case. While Defendants are making best efforts to work at the highest possible level in light of the current circumstances, telecommuting has introduced some novel limitations, including the lack of adequate paralegal and secretarial support, and the inability to access files remotely.

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Respectfully submitted,

Dated: April 13, 2020

SIEGEL, YEE, BRUNNER & MEHTA

By: *__/s/Andrew Chan Kim_____*
Andrew Chan Kim

Attorneys for Plaintiff
JILLIAN PIERCE, on behalf of herself and all others similarly situated,

Dated: April 13, 2020

DENNIS J. HERRERA
City Attorney
MEREDITH B. OSBORN
Chief Trial Deputy
RAYMOND ROLLAN
Deputy City Attorney

By: *_**/s/Raymond Rollan_____*
RAYMOND ROLLAN

Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO

***Pursuant to Civil L.R. 5-1(i)(3), the electronic signatory has obtained approval from this signatory.*

[~~PROPOSED~~] ORDER

PURSUANT TO STIPULATION AND GOOD CAUSE SHOWING, IT IS SO ORDERED.

1. Plaintiff's opposition to Defendants' motion is due on May 1, 2020.

2. Defendants' reply brief is due on May 15, 2020.

3. The hearing on Defendants' Motion to Dismiss is set to June 5, 2020 at 9 a.m.

4. The Case Management Conference is set to July 17, 2020 at 11:00 a.m.

5. The last day to meet and confer re: initial disclosures, early settlement, ADR process selection; and discovery plan is set to July 3, 2020.

6. The last day to file Rule 26(f) Report, complete initial disclosures or state objections in Rule 26(f) Report and file Case Management Statement per Standing Order re Contents of Joint Case Management Statement is set to July 10, 2020.

Dated: April 13, 2020

Hon. Jeffrey S. White