1 2	PETER D. KEISLER Assistant Attorney General					
3	SANDRA SCHRAIBMAN Assistant Branch Director					
<ul><li>4</li><li>5</li><li>6</li><li>7</li></ul>	JOHN R. TYLER United States Department of Justice Civil Division 20 Massachusetts Ave., N.W., Rm. 7344 Washington, DC 20004 Tel: (202) 514-4781 Fax: (202) 616-8470					
8	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA					
9 10	RAHINAH IBRAHIM, ) No. CV 06-00545 WHA Plaintiff, )					
11 12	) THE PARTIES'S STIPULATION TO CONTINUE v. ) THE HEARING DATE ON ALL PENDING MOTIONS, AND ADDITIONAL STIPULATION DEPARTMENT OF HOMELAND ) AND [PROPOSED] ORDER ON A BRIEFING					
13 14	SECURITY, et al.,  Defendants.					
15 16	Pursuant to Civil L.R. 7-7(b), the parties in the above-captioned action hereby stipulate to					
17	continue until Thursday, July 20, 2006 the hearing date on the respective motions to dismiss that have been filed on behalf of (1) the federal defendants, (2) defendants United Airlines, Inc., UAL Corporation, and David Nevins, and (3) defendant John Bondanella. These dispositive motions were previously scheduled to be heard on Thursday, June 29, 2006. The parties furthermore stipulate under Civil L.R. 7-7(b) to continue until July 20, 2006 the hearing date on plaintiff's motion to amend her pleading, which was previously scheduled to be heard on Thursday, July 13,					
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<ul><li>22</li><li>23</li></ul>	2006.					
24	Counsel for the federal defendants requested the above continuance with respect to their					

Counsel for the federal defendants requested the above continuance with respect to their motion to dismiss owing to the number of issues that are raised in plaintiff's opposition memorandum, some of them for the first time, and the inability of counsel to consult with the numerous federal agencies that are named as defendants in this litigation within the very brief

Parties' Stip. to Continue Hearing and Set Briefing Schedule; CV 06-545 WHA

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time permitted under the existing schedule. In order to accommodate the federal defendants, and 1 2 also to avoid any possible scheduling conflicts, the parties agreed to continue the hearing date on 3 all pending motions until July 20, 2006. 4 In regard to briefing, subject to the approval by the Court, the parties additionally 5 stipulate and agree as follows: (1) that all reply memoranda in support of the respective defendants' pending motions to 6 7 dismiss shall be filed no later than Thursday, June 29, 2006; and 8 (2) that any opposition to plaintiff's motion to amend her pleading shall also be filed no 9 later than Thursday, June 29, 2006, and that, if needed, plaintiff shall file her reply 10 memorandum in support of her motion to amend no less than 14 days before the hearing 11 on that motion. 12 Dated: June 12, 2006 McMANIS FAULKNER & MORGAN 13 14 JAMES MCMANIS 15 MARWA ELZANKALY 16 Attorneys for Plaintiff, 17 RAHINAH IBRAHIM 18 Dated: June 12, 2006 CODDINGTON HICKS & DANFORTH 19 20 /s/ RICHARD G. GROTCH 21 Attorneys for Defendants, 22 UNITED AIRLINES, INC., UAL CORP, DAVID NEVINS 23 Dated: June 12, 2006 Dennis J. Herrera, City Attorney 24 Joanne Hoeper, Chief Trial Deputy 25 Ronald P. Flynn, Deputy City Attorney 26 27 Parties' Stip. to Continue Hearing and 28 - 2 -Set Briefing Schedule; CV 06-545 WHA

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1						
2	/s/ RONALD P. FLYNN					
3						
4 5	Attorneys for Defendants, CITY AND COUNTY OF SAN FRANCISCO, JAMES CUNNINGHAM, ELIZABETH A.					
6		MARON	AND RICHARD E. P.	ATE		
7						
8	Dated: June 12, 2006	UNITED	STATES DEPARTMI	ENT OF JUSTICE		
9						
10		JOHN R.	TYLER			
<ul><li>11</li><li>12</li></ul>		Attorneys FEDERA	for Defendants, L DEFENDANTS			
13	Dated: June 12, 2006		& PORTER LLP			
14	,					
15		/s/	, I DOUGLASS MAYO			
16						
17		Attorneys JOHN BC	for Defendant, ONDANELLA	STRICT		
18			TT IS SO 0	RDERED		
19	IT IS SO ORDERED		~  <b>\</b>  ,	lliam Alsup		
20			ETHEN DIST			
21			ABLE WILLIAM H. A	LSUP		
22		United Sta	ates District Judge			
23	This 12th day of June	2006.				
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28	Parties' Stip. to Continue Hearing and Set Briefing Schedule; CV 06- 545 WHA	- 3 -				