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9 Attorneys for Defendants, THE REGENTS OF
THE UNIVERSITY OF CALIFORNIA, et al.
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11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
13

14 THE LOUIS D. BRANDEIS CENTER, INC.;
JEWISH AMERICANS FOR FAIRNESS IN
15 EDUCATION (JAFE),

16 Plaintiffs,

17 vs.

18 REGENTS OF THE UNIVERSITY OF
CALIFORNIA; UNIVERSITY OF
19 CALIFORNIA AT BERKELEY; BERKELEY
SCHOOL OF LAW; MICHAEL DRAKE, in
20 his official capacity as President of the
University of California; CAROL T. CHRIST,
21 in her official capacity as Chancellor of the
University of California, Berkeley; BEN
22 HERMALIN, in his official capacity as
Provost of the University of California,
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24 Defendants.
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Case No. 3:23-cv-06133-JD

**STIPULATED JOINT REQUEST FOR
ORDER EXTENDING DEADLINES
REGARDING DEFENDANTS' MOTION
TO DISMISS**

1 Plaintiffs The Louis D. Brandeis Center, Inc. and Jewish Americans for Fairness in
2 Education, and Defendants The Regents of the University of California, the University of
3 California at Berkeley, Berkeley School of Law, Michael Drake, Carol T. Christ, and Ben
4 Hermalin, through their counsel, and without admission of any kind, or waiver of any defense,
5 objection, or response, stipulate as follows:

6 WHEREAS, Plaintiffs filed this action on November 28, 2023, and Defendants were
7 served with the Summons and Complaint on November 29 and November 30;

8 WHEREAS, the parties previously stipulated (Dkt. 39), pursuant to Civil L.R. 6-1 to
9 extend Defendants' deadline to answer or otherwise respond to Plaintiffs' Complaint until
10 February 5, 2024;

11 WHEREAS, Defendants intend to respond to Plaintiffs' Complaint by filing a Motion to
12 Dismiss pursuant to Fed. R. Civ. P. 12(b) on February 5, 2024 and intend to notice that motion for
13 hearing on March 28, 2024, a date agreed upon by all parties;

14 WHEREAS, Plaintiffs' Opposition to Defendants' Motion to Dismiss would be due on
15 February 20, 2024, pursuant to Civil L.R. 7-3;

16 WHEREAS Defendants' Reply in Support of the Motion to Dismiss would be due on
17 February 27, 2024, pursuant to Civil L.R.7-3;

18 WHEREAS, Civil L.R. 6-2 permits the parties to "file a stipulation . . . requesting an order
19 changing time that would . . . extend time frames set in the Local Rules,";

20 WHEREAS, in order to allow sufficient time for briefing the issues and in recognition of
21 the courtesy extended by Plaintiffs' counsel in extending Defendants' deadline to file a responsive
22 pleading, the parties have agreed to extend Plaintiffs' deadline to file their Opposition to
23 Defendants' Motion to Dismiss by fourteen additional days;

24 WHEREAS, the parties have agreed to extend Defendants' deadline to file their Reply in
25 Support of the Motion to Dismiss by seven additional seven days;

26 WHEREAS, this stipulation will not alter the date of any event or deadline already fixed
27 by Court order and will result in the motion to dismiss being fully briefed approximately 19 days
28 before the planned March 28 hearing date;

1 NOW, THEREFORE, Plaintiffs and Defendants, through their counsel, file this stipulated
2 request as follows:

3 Plaintiffs and Defendants HEREBY JOINTLY REQUEST AN ORDER, pursuant to Civil
4 L.R. 6-2(a), changing Plaintiffs’ deadline to file their Opposition to Defendants’ Motion to
5 Dismiss to and including March 5, 2024; and changing Defendants’ deadline to file their Reply in
6 Support of the Motion to Dismiss to and including March 19, 2024;

7
8 DATED: February 2, 2024

MUNGER, TOLLES & OLSON LLP

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10 By: /s/ Bryan H. Heckenlively
11 BRYAN H. HECKENLIVELY
12 Attorneys for Defendants, THE REGENTS OF
13 THE UNIVERSITY OF CALIFORNIA, et al.

14
15 DATED: February 2, 2024

ELLIS GEORGE CIPOLLONE O’BRIEN LLP

16
17 By: /s/ David J. Carroll
18 DAVID J. CARROLL
19 Attorneys for Plaintiffs, THE LOUIS D.
20 BRANDEIS CENTER, INC., et al.

21 **PURSUANT TO STIPULATION, IT IS SO**
22 **ORDERED.**

23
24 DATED: _____, 2024

THE HONORABLE JAMES DONATO
United States District Court Judge
U.S. District Court, Northern District of California
San Francisco Division

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28 By: THE HONORABLE JAMES DONATO

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FILER'S ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I certify that all other signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

By: /s/ Bryan H. Heckenlively
BRYAN H. HECKENLIVELY
Attorney for Defendants