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 CORY SPENCER, DIANA MILENA
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 RANGERS, INC.
 20

21 **UNITED STATES DISTRICT COURT**
 22 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
 23

24 CORY SPENCER, an individual;
 25 DIANA MILENA REED, an
 individual; and COASTAL
 26 PROTECTION RANGERS, INC., a
 27 California non-profit public benefit
 corporation,
 28

CASE NO. 2:16-cv-02129-SJO (RAOx)
**PLAINTIFFS' REQUEST FOR
 EXTENSION OF TIME, UP TO AND
 INCLUDING AUGUST 7, 2017, TO
 OPPOSE DEFENDANTS' MOTIONS
 FOR SUMMARY JUDGMENT**

Filed Concurrently with Declaration of

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Plaintiffs,

v.

LUNADA BAY BOYS; THE INDIVIDUAL MEMBERS OF THE LUNADA BAY BOYS, including but not limited to SANG LEE, BRANT BLAKEMAN, ALAN JOHNSTON AKA JALIAN JOHNSTON, MICHAEL RAE PAPAYANS, ANGELO FERRARA, FRANK FERRARA, CHARLIE FERRARA, and N. F.; CITY OF PALOS VERDES ESTATES; CHIEF OF POLICE JEFF KEPLEY, in his representative capacity; and DOES 1-10,

Defendants.

Samantha Wolff; Proposed Order

Complaint Filed: March 29, 2016
Trial Date: November 7, 2017

Plaintiffs Cory Spencer, Diana Milena Reed, and the Coastal Protection Rangers, Inc. ("Plaintiffs") respectfully request that this Court extend Plaintiffs' deadline to oppose Defendants' summary-judgment motions by an additional seven days, up to and including August 7, 2017, for the reasons set forth below.

Per this Court's August 29, 2016 Scheduling Conference, the motion cutoff was set for August 21, 2017. (Dkt. No. 120.) Application of the local rules mandate that motions for summary judgment be filed in this matter no later than July 24, 2017 (28 days in advance). See C.D. Cal. Local R. 6-1 (2016). Plaintiffs' oppositions must be filed 21 days in advance of the hearing, on or before July 31, 2017. See *id.* at 7-9. This gives Plaintiffs only seven days to oppose multiple anticipated motions.

Plaintiffs met and conferred with each Defendant in this matter and

1 anticipate receipt of motions or partial motions for summary judgment from
2 nearly each defendant. (Decl. S. Wolff Supp. Pls.' Req. for Ext. of Time
3 (Decl. Wolff), ¶ 2.) At least five Defendants have already filed motions as of
4 the time of this filing: Defendants City of Palos Verdes Estate and Chief
5 Kepley (City Defendants) filed their motion for summary judgment on July
6 14, 2017 (Dkt. No. 268), Defendant Sang Lee filed his partial motion on July
7 21, 2017 (Dkt. No. 274); and Defendants Papayans and Angelo Ferrara filed
8 their motions on July 24, 2017 (Dkt. Nos. 278, 279). Plaintiffs will be hard-
9 pressed to oppose multiple summary-judgment motions from likely a half-
10 dozen defendants in one week's time and therefore request an additional
11 week to oppose these motions.¹ See *Ahanchian v. Xenon Pictures, Inc.*,
12 624 F.3d 1253 (9th Cir. 2010) (noting the "peculiar dictates of the local rules
13 for the Central District of California" which result in "an exceptionally
14 constrained deadline" of 7 days to oppose a motion).

15 Further, Plaintiffs have been engaged in discovery disputes with a
16 number of defendants, and are currently anticipating document productions
17 from at least three defendants. (Decl. Wolff, ¶¶ 3, 4.) Plaintiffs have been
18 actively pursuing this discovery, as is evident from the Court Docket, which
19 demonstrates the numerous hearings before Magistrate Judge Oliver at
20 Plaintiffs' request. (See, e.g., Dkt. Nos. 243, 246, 255, 267, 273, 276.)
21 Plaintiffs will likely need this information to oppose Defendants' motions, and
22 at the very least, would like time to receive and review this information.
23 Additionally, despite requesting to depose Defendant Alan Johnston in June
24 _____

25 ¹ Because the City Defendants filed their motion on July 14, 2017, Plaintiffs
26 will have 17 days to oppose their motion for summary judgment, and
27 therefore are not requesting additional time to oppose the City Defendants'
28 motion.

1 2017, Defendant Johnston was not ordered to be available for his deposition
2 until July 28, 2017. (Dkt. No. 258.) Thus, absent any extension, Plaintiffs
3 will effectively have three days (two of which occur over the weekend)
4 following Defendant Johnston's deposition to prepare their and file
5 opposition to his anticipated motion.

6 Plaintiffs met and conferred with counsel for Defendants Brant
7 Blakeman, Michael Rae Papayans, Alan Johnston, Charlie Ferrara, Frank
8 Ferrara, Angelo Ferrara, and N.F. on July 14, 2017 to discuss Defendants'
9 anticipated motions for summary judgment. (Decl. Wolff, ¶ 2.) At that time,
10 Plaintiffs requested a full 14 days to oppose Defendants' motions, rather
11 than the 7 days they are presently afforded under the local rules. Defense
12 counsel who were present stated that they were generally amenable to this
13 request. (Decl. Wolff, ¶ 2.)

14 This request is not being made for any improper purpose, and
15 Plaintiffs are not seeking to unreasonably delay resolution of this matter.
16 (Decl. Wolff, ¶ 6.) Nor will this request prejudice any party. (*Id.*) Plaintiffs
17 have only previously sought and been granted one extension of time with
18 respect to the Court's deadlines in this matter. (See Dkt. No. 29, granting
19 joint stipulation to amend Plaintiffs' deadline to file class certification motion.)

20 In light of the above, and good cause showing, Plaintiffs respectfully
21 request an additional 7 days to respond to Defendants' motions for summary
22 judgment, up to and including August 7, 2017. See *Ahanchian*, 624 F.3d
23 1253, 1260 (finding that district court abused its discretion in denying
24 plaintiff's request for an additional 7 days to oppose defendant's summary-
25 judgment motion after demonstrating good cause).

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DATED: July 24, 2017

HANSON BRIDGETT LLP

By: /s/ Samantha Wolff
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