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JR.

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF LOS ANGELES

12 CENTRAL DISTRICT

13 JANICE DICKINSON, an individual,

14 Plaintiff,

15 vs.

16 WILLIAM H. COSBY, JR., an individual; and  
DOES 1 through 100, inclusive,

17 Defendants.

CASE NO. BC 580909

**STIPULATION AND [PROPOSED]  
ORDER RE BRIEFING SCHEDULE ON  
PLAINTIFF'S MOTION TO LIFT STAY**

Assigned to Hon. Debre Katz Weintraub

Hearing on Motion to Lift Stay

Date: October 29, 2015

Time: 8:30 a.m.

Dept. 47

Filing Date: May 20, 2015

Trial Date: None Set

1 Plaintiff Janice Dickinson (“Dickinson”), by and through her counsel of record, The  
2 Bloom Firm, and defendant William Cosby, Jr. (“Cosby”), by and through his counsel of record,  
3 Quinn Emanuel Urquhart & Sullivan LLP (“Quinn Emanuel”), (Dickinson and Cosby are  
4 collectively referred to as the “Parties”), hereby submit this Stipulation and [Proposed] Order Re  
5 Briefing Schedule On Plaintiff’s Motion To Lift Stay pursuant to Rule 3.503 of the California  
6 Rules of Court:

7 WHEREAS, on June 22, 2015, Cosby filed a Motion to Strike Plaintiff’s Complaint  
8 Pursuant to Code of Civil Procedure Section 425.16 (the “Anti-SLAPP Motion”);

9 WHEREAS, on September 21, 2015, Dickinson filed a Motion to Lift Stay of Discovery  
10 Pursuant to CCP §425.16(g) (the “Motion to Lift Stay”);

11 WHEREAS, Cosby’s Opposition to the Motion to Lift Stay is currently due on Friday,  
12 October 16, 2015;

13 WHEREAS, on or about October 13, 2015, Cosby retained new counsel, Quinn Emanuel  
14 to represent him in the above-captioned matter;

15 WHEREAS, Quinn Emanuel did not learn of the Motion to Lift Stay and the current  
16 briefing schedule until the afternoon of October 14, 2015, and Quinn Emanuel did not receive the  
17 moving papers on the Motion to Lift Stay until approximately 5:00 p.m. on October 14, 2015;

18 WHEREAS, Dickinson has agreed to extend the deadline for Cosby to file and serve his  
19 reply papers from Friday, October 16, 2015 to Monday, October 19, 2015, in order to provide  
20 Quinn Emanuel with additional time to review the moving papers and prepare the opposition;

21 WHEREAS, Cosby has agreed to extend the deadline for Dickinson to file and serve her  
22 reply papers from Thursday, October 22, 2015, until Monday, October 26, 2015;

23 WHEREAS, the Parties have agreed that, unless the Court orders otherwise, the hearing  
24 date on the Motion to Lift Stay shall remain on calendar for Thursday, October 29, 2015, at 8:30  
25 a.m. in Department 47.

26 ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED that the briefing  
27 schedule on the Motion to Lift Stay be modified as follows:  
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**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 865 South Figueroa Street, 10th Floor, Los Angeles, CA 90017-2543.


On October 16, 2015, I served true copies of the following document(s) described as **STIPULATION AND [PROPOSED] ORDER RE BRIEFING SCHEDULE ON PLAINTIFF’S MOTION TO LIFT STAY** on the interested parties in this action as follows:

Lisa Bloom  
Jivaka Candappa  
Nadia Taghizadeh  
**THE BLOOM FIRM**  
20700 Ventura Blvd., Suite 301  
Woodland Hills, CA 91364  
Tel: (818) 914-7314

**BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Quinn Emanuel Urquhart & Sullivan, LLP for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at Los Angeles, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on October 16, 2015, at Los Angeles, California.

  
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Candy Liao