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CITY AND COUNTY OF SAN FRANCISCO and
SAN FRANCISCO POLICE DEPARTMENT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DOUGLAS CHURCHILL, PETER LAU,
THE CALGUNS FOUNDATION, INC., THE
SECOND AMENDMENT FOUNDATION,
INC.,

Plaintiffs,

vs.

KAMALA HARRIS – as Attorney General,
CALIFORNIA DEPARTMENT OF JUSTICE,
CITY/COUNTY OF SAN FRANCISCO, and
SAN FRANCISCO POLICE DEPARTMENT,
CITY OF OAKLAND, OAKLAND POLICE
DEPARTMENT and Does 1 to 20,

Defendants.

Case No. C12-1740 LB

**DECLARATION OF CHRISTINE VAN AKEN
IN SUPPORT OF STIPULATION AND
[PROPOSED] ORDER TO CONTINUE
INITIAL CASE MANAGEMENT
CONFERENCE**

Trial Date: None Set

1 I, Christine Van Aken, declare as follows:

2 1. I am a Deputy City Attorney for the City and County of San Francisco and an attorney
3 of record for defendants City and County of San Francisco and the San Francisco Police Department.
4 The matters within this declaration are true of my personal knowledge or, where stated otherwise,
5 upon information and belief.

6 2. The parties to this case are submitting a stipulated request for an order continuing the
7 Initial Case Management Conference and related deadlines. The new date for the initial case
8 management conference would be January 17, 2013, at 10:30 a.m.

9 3. This request is made for good cause. The Court is considering the California
10 Department of Justice's motion to dismiss this case for lack of jurisdiction and/or failure to state a
11 cause of action, and the City and County of San Francisco and plaintiffs are working diligently in an
12 attempt to reach a settlement agreement. San Francisco and plaintiffs are hopeful that they will be
13 able to reach such an agreement, and have made progress to that effect, but have not yet finalized an
14 agreement. Continuing the initial case management conference would enable the parties to continue
15 their settlement efforts while conserving judicial resources.

16 4. There has been one previous modification of time in this case: the parties stipulated,
17 and the Court ordered, a continuance of the initial case management conference to accommodate my
18 vacation schedule during the summer. I believe that this proposed modification of time will have
19 minimal impact on the schedule for this case because the continuance requested is short and because
20 the continuance will save judicial resources in the event the dispute between San Francisco and
21 plaintiffs is resolved through settlement.

22 I declare under penalty of perjury under the laws of the State of California that the foregoing is
23 true and correct. Executed this 20th day of November, 2012, at San Francisco, California.

24
25 s/Christine Van Aken
Christine Van Aken