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11 Attorneys for Debtor and Defendant
 City of Stockton, California

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 13 UNITED STATES BANKRUPTCY COURT
 14 EASTERN DISTRICT OF CALIFORNIA
 15 SACRAMENTO DIVISION

17 In re:
 18 CITY OF STOCKTON, CALIFORNIA,
 19 Debtor.

Case No. 12-32118
 Chapter 9
 Adv. No. 2013-02315
 OHS-1

20 WELLS FARGO BANK NATIONAL
 21 ASSOCIATION, FRANKLIN HIGH
 22 YIELD TAX-FREE INCOME FUND,
 AND FRANKLIN CALIFORNIA
 23 HIGH YIELD MUNICIPAL FUND,

**MOTION TO SHORTEN NOTICE ON
 DEFENDANT CITY OF STOCKTON'S
 MOTION FOR JUDGMENT TO BE
 ENTERED IN FAVOR OF
 PLAINTIFFS**

24 Plaintiffs,

Date: April 7, 2014
 Time: 1:30 p.m.
 Dept: Courtroom 35
 Judge: Hon. Christopher Klein

25 v.

26 CITY OF STOCKTON, CALIFORNIA,
 27 Defendant.

1 The City of Stockton, California (the “City”), the debtor and the defendant in the above-
2 captioned case and adversary proceeding, respectively, moves (by this “Motion”) for entry of an
3 order shortening the notice period for the hearing on the Defendant City Of Stockton’s Motion
4 For Judgment To Be Entered In Favor Of Plaintiffs (the “Motion for Judgment”), which pleading
5 the City is filing concurrently. Pursuant to Local Rule 9014-1(f)(3), the Court can, for good cause
6 shown, order that the amount of notice for a hearing be shortened to fewer than 14 days. The City
7 respectfully represents that good cause exists to shorten notice of the hearing on the Motion for
8 Judgment from 14 days to 11 days.

9 At a status conference on March 19, 2014, the Court set further status conferences on
10 April 7, 2014 1:30 p.m. and on April 28, 2014 1:30 p.m. Of the Court’s available hearing dates
11 before the start of the trial and confirmation hearing on May 12, 2014, these were the only dates
12 that appeared to work for the parties to the adversary proceeding.

13 The Motion for Judgment asks that the Court enter an order dispensing with the major
14 issues in the adversary proceeding and directing entry of a judgment in favor of plaintiffs and
15 against the City in the form, content and manner described in the Judgment Motion. In so doing,
16 it seeks a prompt resolution of this litigation by eliminating an issue that the City chooses not to
17 contest. If granted, the relief sought by the Motion for Judgment will expedite the confirmation
18 hearing and greatly reduce, if not eliminate, the need for further briefing on the issues raised in
19 the adversary proceeding. However, many of the benefits of expediting preparations for the
20 confirmation trial would be lost if the Motion for Judgment is not heard until April 28, only two
21 weeks before the trial and confirmation hearing. The City therefore seeks to have the Motion for
22 Judgment heard on April 7, the only other date available for a hearing prior to the start of trial.

23 The plaintiffs would not be prejudiced if the Motion were granted and the notice of the
24 hearing on the Motion for Judgment were shortened by three days such that it can be heard on the
25 previously-scheduled April 7 hearing date. Plaintiffs still will have 11 days to evaluate the relief
26 sought by the Motion for Judgment. Their evaluation should take much shorter than that, given
27 that the Motion for Judgment cites no case law and merely seeks to give plaintiffs the relief that
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1 they have requested in their complaint in the adversary proceeding. Moreover, should the Motion
2 for Judgment be granted on April 7, the issues to be decided at confirmation will be significantly
3 narrowed a month prior to the confirmation hearing, permitting all parties to the contested
4 confirmation to more efficiently focus on the remaining unresolved issues.

5 For the foregoing reasons, the City believes that cause exists to grant the City an order
6 shortening the notice period on the Motion for Judgment such that the Motion for Judgment will
7 be heard on April 7, 2014, at 1:30 p.m.

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Dated: March 27, 2014

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By: /s/ Marc A. Levinson
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City of Stockton, California