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13 CWA Felix

14 **UNITED STATES DISTRICT COURT**  
15 **EASTERN DISTRICT OF CALIFORNIA**

16 AE,

17 Plaintiff,

18 v.

19 COUNTY OF TULARE, et al.

20 Defendants.

**CASE NO. 1:09-CV-02204-LJO-DLB**

**STIPULATION OF THE PARTIES  
21 CONSENTING TO CONTINUE DISCOVERY  
22 DEADLINES, SETTLEMENT CONFERENCE  
23 AND TRIAL DATE; AND ORDER**

24 The undersigned parties hereby request and consent to the rescheduling of the Settlement  
25 Conference, Discovery Deadlines and the Trial Date for the following reasons:

26 The plaintiff has requested and been granted authority to file a Fifth Amended Complaint, for  
27 the purpose of naming new defendants, by June 17, 2011.

28 There is an appeal pending with the Ninth Circuit regarding the dismissal of Defendant,  
County of Tulare from this action. The matter has been briefed and oral argument was heard on  
April 13, 2011, however, no decision has been reached.

A settlement conference is currently set for June 22, 2011, with the statement due by June 15,  
2011. Any attempt at settlement at this point would be futile as the parties to this action are still  
uncertain.

A hearing on Defendants, YADIRA PORTILLO, COURTNEY WAMPLER, AND CWA

1 FELIX's motion for leave to file and serve a Third-Party Complaint to implead former Defendant,  
2 FAMILY BUILDERS FOSTER CARE, INC. is set for June 17, 2011.

3 Discovery in this matter has been delayed pending the outcome of these issues.

4 For the foregoing reasons, the parties hereby stipulate and agree as follows:

- 5 1. The settlement conference set for June 22, 2011, is continued to December 14, 2011.
- 6 2. The deadline for the Expert Witness Disclosure is continued from July 22, 2011, to  
7 January 20, 2012.
- 8 3. The deadline for non-expert discovery is continued from August 5, 2011, to February 3,  
9 2012.
- 10 4. The deadline for disclosure of supplemental experts is continued from August 11, 2011,  
11 to February 10, 2012.
- 12 5. The deadline for expert discovery is continued from September 2, 2011, to March 2,  
13 2012.
- 14 6. The deadline for filing of Non-Dispositive Motions is continued from September 26,  
15 2011, to March 19, 2012.
- 16 7. The deadline for filing of Dispositive Motions is continued from October 24, 2011, to  
17 April 23, 2012.
- 18 8. The deadline for hearings on Non-Dispositive Motions is continued from October 21,  
19 2011, to April 20, 2012.
- 20 9. The deadline for hearings on Dispositive Motions is continued from December 7, 2011,  
21 to June 6, 2012.
- 22 10. The Pre-Trial Conference currently set for January 25, 2012, is continued to July 25,  
23 2012.
- 24 11. The Trial set to commence on March 19, 2012, is continued to September 17, 2012.

25 Dated: 06/07/11  
26 (authorized via email 06/07/11)

RODRIGUEZ & ASSOCIATES

27 By /s/ Charles R. Chapman  
28 CHARLES R. CHAPMAN  
Attorney for Plaintiff

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Dated: 06/07/11  
(authorized via email 06/07/11)

GORDON & REES LLP

By /s/ George Acero  
GEORGE ACERO  
Attorney for Defendants Adrian Marquez and Tulare  
Youth Services Bureau, Inc.

Dated: 06/07/11

KATHLEEN BALES-LANGE  
Tulare County Counsel

By /s/ Judy Chapman  
Judy Chapman  
Deputy County Counsel  
Attorneys for Yadira Portillo, Courtney Wampler,  
and CWA Felix

Dated: 06/08/11  
(authorized via email 06/08/11)

WEST & MIYAMOTO

By /s/ Eugene F. West  
EUGENE F. WEST  
Attorney for Defendant, Sandra Ceballos

IT IS SO ORDERED.

Dated: June 15, 2011

/s/ Dennis L. Beck  
UNITED STATES MAGISTRATE JUDGE