

1 DANIEL RODRIGUEZ, ESQ., SBN 096625
2 JOEL T. ANDREESSEN, ESQ., SBN 152254
3 MARTHA J. ROSSITER, ESQ., SBN 256234
4 RODRIGUEZ & ASSOCIATES
5 2020 EYE STREET, BAKERSFIELD, CA 93301
6 TELEPHONE: (661) 323-1400 FAX: (661) 323-0132

7 Attorneys for Plaintiff VICTORIA YOUNGBLOOD

8
9
10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12

13 VICTORIA P. YOUNGBLOOD,) Case No. 1:12-CV-01150-AWI-JLT
14)
15 Plaintiff,) STIPULATION AND ORDER TO
16 vs.) CONTINUE TRIAL DATE TO
17) JANUARY 21, 2015
18)
19 CITY OF BAKERSFIELD,)
20 CHRISTOPHER DALTON, GREG)
21 WILLIAMSON, and DOES 1 to 100,)
22 Inclusive,)
23 Defendants.)
24)
25)
26)
27)
28)

Victoria Youngblood, through the undersigned counsel of record, and defendants City of Bakersfield, Christopher Dalton, and Greg Williamson, through their undersigned counsel of record, hereby stipulate and respectfully request the Court to continue the trial date to January 21, 2015.

1 The matter was originally set for trial on April 22, 2014. On its own motion, the
2 Court continued the case to May 20, 2014. However, defense counsel had a conflict on
3 that date and as such, the Court advised the parties to meet and confer to select a new
4 date that worked for all parties. The parties stipulated to vacate the May 20, 2014 trial
5 date, which the Court ordered. [See Dkt No. 62].

6 Having met and conferred, the parties respectfully request that the Court reset the
7 trial of this matter to January 21, 2015 and set the pretrial conference on or about
8 December 11, 2014.

9
10 IT IS SO STIPULATED.
11

12 Respectfully submitted,

13
14 Dated: June 18, 2014

15
16
17 RODRIGUEZ & ASSOCIATES

18 _____
19 Martha J. Rossiter
20 Attorney for Plaintiff

21 Dated: June 18, 2014

22
23 CITY OF BAKERSFIELD

24 _____
25 Michael Marderosian
26 Attorney for Defendants
27
28

1 DANIEL RODRIGUEZ, ESQ., SBN 096625
2 JOEL T. ANDREESSEN, ESQ., SBN 152254
3 MARTHA J. ROSSITER, ESQ., SBN 256234
4 RODRIGUEZ & ASSOCIATES
5 2020 EYE STREET, BAKERSFIELD, CA 93301
6 TELEPHONE: (661) 323-1400 FAX: (661) 323-0132

7 Attorneys for Plaintiff VICTORIA YOUNGBLOOD

8
9
10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12

13 VICTORIA P. YOUNGBLOOD,) **Case No. 1:12-CV-01150-AWI-JLT**
14)
15 Plaintiff,) **ORDER CONTINUING TRIAL DATE**
16)
17 vs.)
18)
19 CITY OF BAKERSFIELD,)
20 CHRISTOPHER DALTON, GREG)
21 WILLIAMSON, and DOES 1 to 100,)
22 Inclusive,)
23 Defendants.)
24)
25)
26)
27)
28)

29 This matter came before the Court on the parties' stipulation to continue the trial
30 date to January 21, 2015. The Court ADOPTS the stipulation and finds good cause to
31 continue the date.
32

1 Accordingly, IT IS HEREBY ORDERED THAT:

- 2
- 3 1. The trial in this matter is continued from May 20, 2014 to January 21, 2015 at
4 8:30 a.m.;
- 5 2. That the pretrial conference be continued to December 11, 2014, at 8:30 a.m.
- 6

7 IT IS SO ORDERED.

8 Dated: June 18, 2014


9 SENIOR DISTRICT JUDGE

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24 **PROOF OF SERVICE**

25

26 STATE OF CALIFORNIA, COUNTY OF KERN

27 I am employed in the County of Kern, State of California. I am over the age of 18
28 and not a party to the within action; my business address is 2020 Eye Street, Bakersfield,
California 93301

1
2 On June , 2014, I served the foregoing document described as follows:

3
4 X by placing the true copies thereof
5 _____ by placing the original

6 addressed as follows: **SEE ATTACHED SERVICE LIST**

7
8 X **BY MAIL** - I enclosed such document in a sealed envelope and caused such
9 envelope to be deposited in the mail at Bakersfield, California. The envelope was mailed
10 with postage thereon fully prepaid. I am “readily familiar” with this firm’s practice of
11 collection and processing of correspondence for mailing. It is deposited with the U.S.
12 Postal Service on that same day in the ordinary course of business. I am aware that on
13 motion of party, service is presumed invalid if postal cancellation date or postage meter date
14 is more than one day after date of deposit for mailing affidavit.

15
16 _____ **BY OVERNIGHT DELIVERY** - I enclosed such document in a sealed envelope
17 and caused it to be deposited in a box or other facility regularly maintained by the express
18 service carrier, or delivered to an authorized courier or driver authorized by the express
19 service carrier to receive documents, in an envelope or package designated by the express
20 service carrier with delivery fees paid or provided for, addressed to the person on whom it is
21 to be served, at the office address as last given by that person.

22
23 _____ **BY FACSIMILE** - I caused such document to be transmitted to a facsimile machine
24 maintained by the person on whom it is served at the facsimile machine telephone number
25 as last given by that person.

26
27 _____ **BY PERSONAL SERVICE** - I enclosed such document in a sealed envelope and
28 caused it to be delivered by hand to the offices of the addressee(s).

Executed on June , 2014 at Bakersfield, California.

X (Federal) I declare under penalty of perjury under the laws of the United States
that the above is true and correct.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PATRICK BENITEZ

PROOF OF SERVICE LIST

Michael G. Marderosian, Esq.
Heather S. Cohen, Esq.

ATTORNEYS FOR DEFENDANTS:
CITY OF BAKERSFIELD,

1 MARDEROSIAN, RUNYON,
2 CERCONE & COHEN
3 1260 Fulton Mall
4 Fresno, CA 93721

**CHRISTOPHER DALTON, and
GREG WILLIAMSON**

5 Virginia Gennaro, Esq.
6 City Attorney
7 CITY OF BAKERSFIELD
8 1501 Truxtun Avenue
9 Bakersfield, CA 93301

**ATTORNEY FOR DEFENDANTS:
CITY OF BAKERSFIELD,
CHRISTOPHER DALTON, and
GREG WILLIAMSON**

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28