

1 BENJAMIN B. WAGNER  
United States Attorney  
2 ALYSON A. BERG  
Assistant United States Attorney  
3 2500 Tulare Street, Suite 4401  
Fresno, California 93721  
4 Telephone: (559) 497-4000  
Facsimile: (559) 497-4099  
5

6 Attorneys for Defendant UNITED STATES OF AMERICA  
7

8 **UNITED STATES DISTRICT COURT**  
9 **EASTERN DISTRICT OF CALIFORNIA**

10 GREGORY EDISON )  
11 Plaintiff, ) Case No. 1:12-CV-02026 AWI-JLT  
12 v. ) STIPULATION FOR EXTENSION OF  
TIME TO RESPOND TO  
13 UNITED STATES OF AMERICA; THE GEO )  
GROUP, INC.; MANAGEMENT & )  
14 TRAINING CORPORATION; and JOHN )  
DOES 1-50, )  
15 Defendants. )  
16

17 Plaintiff Gregory Edison (“Plaintiff”), Defendants United States of America (“United  
18 States”), GEO Group, Inc (“GEO”) and Management & Training Corporation (“MTC”) (collectively  
19 “the parties”) stipulate, by and through the undersigned counsel, to extend the deadline for United  
20 States to respond to the complaint to and including April 8, 2013.

21 The parties further agree to continue the date of the scheduling conference currently set for  
22 April 9, 2013 at 9:30 a.m. before Magistrate Judge Thurston in Bakersfield, California to June 27,  
23 2013 at 9:00 a.m. before Magistrate Judge Thurston in Bakersfield, California.

24 The parties base this stipulation on good cause, which includes the need for United States to  
25 review the allegations in the Complaint and respond accordingly.

26 ///  
27 ///  
28 ///

1 Accordingly, the parties stipulate and agree to continue the time for the United States to file a  
2 responsive pleading to the Complaint and the scheduling conference as specified below, and base it  
3 on the above-stated good cause. The parties request the court to endorse this stipulation by way of  
4 formal order.

	Old Date	New Date	
5			
6	United States' response	March 8, 2013	April 8, 2013
7	to Complaint		
8	Scheduling Conference	April 9, 2013	June 27, 2013 @9:00

9 Respectfully submitted,

10 Dated: February 20, 2013

BENJAMIN B. WAGNER  
UNITED STATES ATTORNEY

11  
12 /s/Alyson A. Berg  
Alyson A. Berg  
Assistant United States Attorney  
Attorney for Defendant United States of America

14 Dated: February 20, 2013

FELDMAN AND WALLACH

15  
16 (As authorized 02/20/2013)  
/s/Ian Michael Wallach  
Ian Michael Wallach  
Attorneys for Plaintiff Gregory Edison

18 Dated: February 20, 2013

BURKE, WILLIAMS & SORENSEN LLP  
19  
20 (As authorized 02/20/2013)  
/s/Susan E. Coleman  
Susan E. Coleman  
Attorney for Defendants The GEO Group, Inc.  
and Management & Training Corporation (MTC)

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

**ORDER**

Having reviewed the stipulation submitted the parties, the court hereby extends the time for the United States' to respond to the complaint to April 8, 2013. The scheduling conference currently set for April 9, 2013 is hereby continued to June 27, 2013 at 9:00 a.m.

IT IS SO ORDERED.

Dated: February 20, 2013

/s/ Jennifer L. Thurston  
UNITED STATES MAGISTRATE JUDGE

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