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8 **Attorneys for Defendants**
9 **County of Kern, Deputy Jason Ayala**
10 **and Deputy Joshua Bathe**

11 **UNITED STATES DISTRICT COURT**
12 **EASTERN DISTRICT OF CALIFORNIA**

13 **KEANU ETHAN CAMPOS, a minor, by**
14 **and through his Guardian ad Litem,**
15 **Deniz Gonzalez,**

16 **Plaintiffs,**

17 **vs.**

18 **COUNTY OF KERN, a public entity;**
19 **DEPUTY JASON AYALA, a public**
20 **employee; DEPUTY JOSHUA BATHE, a**
21 **public employee; and DOES 1 - 10,**
22 **Inclusive**

23 **Defendants.**

CASE NO. 1:14-cv-01099-DAD-JLT

JOINT STIPULATION TO CONTINUE
MANDATORY SETTLEMENT
CONFERENCE; [PROPOSED
ORDER]

(Doc. 33)

24 COME NOW, Plaintiff, KEANU ETHAN CAMPOS, by and through his Guardian
25 ad Litem, Deniz Gonzalez and Defendants, COUNTY OF KERN, DEPUTY JASON
26 AYALA an DEPUTY JOSHUA BATHE, who have met and conferred through their
27 respective attorneys of record, and now make this joint stipulated request of the Court:

28 **REPRESENTATIONS AND JOINT STIPULATION AND REQUEST:**

1. The Mandatory Settlement Conference ("MSC") in this matter is set before
Magistrate Judge, Jennifer L. Thurston, on January 11, 2016 at 9:30 a.m.;

1 2. Defendants anticipate the filing of a motion for summary judgement
2 (“MSJ”) on all issues raised by the First Amended Complaint, on or before February 10,
3 2016;

4 3. Plaintiff and Defendants have timely exchanged settlement demands and
5 offers, but believe that a settlement conference, prior to the resolution of the issues to
6 be raised in the anticipated MSJ, will not be productive and therefore, the case currently
7 is not postured for meaningful negotiations or potential settlement;

8 4. Therefore, Plaintiff and Defendants mutually invoke the provision made in
9 the Scheduling Order (Doc. No. 26, p. 6, Section X, fn. 3) and stipulate that the Court
10 continue the MSC set for January 11, 2016 to a date/time convenient to the Court
11 sometime after March 23, 2016, which is the last date possible for hearing of the MSJ.
12 The parties suggest that the MSC be continued to the following date:

13 Date: April 1, 2016

14 Time: 9:30 a.m.

15
16 Dated: January 6, 2016

THERESA A. GOLDNER, COUNTY COUNSEL

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18 By: /s/ Marshall S. Fontes

19 Marshall S. Fontes, Deputy
20 Attorneys for Defendants, County of Kern,
21 Deputy Jason Ayala and Deputy Joshua
22 Bathe

23
24 Dated: January 6, 2016

LAW OFFICES OF GARROTTO & GARROTTO

25 By: /s/ Greg Garrotto

26 Greg Garrotto, Esq.
27 Attorneys for Plaintiff, Keanu Ethan Campos,
28 a minor, by and through his Guardian ad
 Litem, Deniz Gonzalez

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[PROPOSED] ORDER

Based upon the stipulation of counsel, the Court **ORDERS:**

1. The settlement conference is **CONTINUED** to April 1, 2016 at 9:30 a.m.
2. Counsel SHALL comply with the scheduling order related to the settlement

conference (Doc. 26 at 6-7).

IT IS SO ORDERED.

Dated: January 6, 2016

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE