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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
THE MANDATORY SETTLEMENT
CONFERENCE PENDING
RESOLUTION OF DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT; [PROPOSED ORDER]

(Doc. 49)

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 May 2, 2016 at 1:30 p.m.;

1 2. Defendants have filed a motion for summary judgment (“MSJ”) as to all
2 claims. The motion has been briefed and argued. The Court took the matter under
3 submission on March 15, 2016, and thereafter requested supplemental briefing from
4 the parties which was completed on March 31, 2016. There has been no ruling yet on
5 the MSJ from the Court;

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

10 4. Therefore, Plaintiff and Defendants mutually invoke the provision made in
11 the Scheduling Order (Doc. No. 26, p. 6, Section X, fn. 3) and stipulate that the Court
12 continue the MSC currently set for May 2, 2016 to May 23, 2016 at 1:30 p.m.

13 Dated: April 25, 2016

THERESA A. GOLDNER, COUNTY COUNSEL

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15 By: /s/ Marshall S. Fontes

16 Marshall S. Fontes, Deputy
17 Attorneys for Defendants, County of Kern,
18 Deputy Jason Ayala and Deputy Joshua
Bathe

19 Dated: April 25, 2016

LAW OFFICES OF GARROTTO & GARROTTO

20
21 By /s/ Greg Garrotto

22 Greg Garrotto, Esq.
23 Attorneys for Plaintiff, Keanu Ethan Campos,
24 a minor, by and through his Guardian ad
25 Litem, Deniz Gonzalez
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[PROPOSED] ORDER

For GOOD CAUSE shown, and based upon the mutual Stipulation of all parties to this action, the court hereby continues the MSC set for May 2, 2016 at 1:30 p.m. to **May 17, 2016** at 1:30 p.m.

IT IS SO ORDERED.

Dated: April 25, 2016

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE