

1 Ian Wallach, SBN 237849
Jason K. Feldman SBN 213386
2 FELDMAN & WALLACH
3 606 Venice Blvd., Suite C
Venice, CA 90291
4 Telephone: (310) 577-2001
Fax: (310) 564-2004
5 ian@feldmanwallach.com
jason@feldmanwallach.com

6 Attorneys for Plaintiffs
7

8 Raymond P. Boucher, SBN 115364
ray@boucher.la
9 Hermez Moreno, SBN 72009
moreno@boucher.la
10 Milin Chun, SBN 262674
chun@boucher.la
11 Brian M. Bush, SBN 294713
bush@boucher.la
12 BOUCHER LLP
13 21600 Oxnard Street, Suite 600
14 Woodland Hills, CA 91367-4903
15 Tel: (818) 340-5400
Fax: (818) 340-5401

16 Attorneys for Plaintiffs
17

PHILLIP A. TALBERT
United States Attorney
ALYSON A. BERG
Assistant United States Attorney
2500 Tulare Street, Suite 4401
Fresno, California 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099

Attorneys for Defendant
United States of America

Susan E. Coleman (SBN 171832)
Kristina Gruenberg (SBN 268188)
BURKE, WILLIAMS & SORENSEN, LLP
444 South Flower Street, Suite 2400
Los Angeles, CA 90071-2953
Telephone: (213) 236-0600
Fax: (213) 236-2700
scoleman@bwslaw.com

Attorney for Defendant
Management & Training Corporation

18 **UNITED STATES DISTRICT COURT**
19 **EASTERN DISTRICT OF CALIFORNIA**
20

21 GREGORY EDISON,
22 Plaintiff,
23 v.
24 UNITED STATES OF AMERICA; THE GEO
25 GROUP, INC.; MANAGEMENT AND
26 TRAINING CORPORATION,
27 Defendants.

Case No. 1:12-cv-02026-AWI-JLT

**JOINT STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
RESPOND TO THE AMENDED
COMPLAINTS AND [PROPOSED]
ORDER**

(Doc. 59)

1 RICHARD NUWINTORE,

2 Plaintiff,

3 v.

4 UNITED STATES OF AMERICA;
5 MANAGEMENT AND TRAINING
6 CORPORATION,

7 Defendants.

Case No. 1:13-cv-00967-AWI-JLT

8 LOUIS C. DOMINGO,

9 Plaintiff,

10 v.

11 MANAGEMENT & TRAINING
12 CORPORATION; and JOHN DOES 1-9,

13 Defendants.

Case No. 1:15-cv-00284-AWI-JLT

14
15 Defendants United States and Management and Training Corporation (hereafter known as
16 “Defendants”), and Plaintiffs Gregory Edison, Richard Nuwintore, and Louis Domingo (hereafter
17 known as “Plaintiffs”), by and through their respective counsel, stipulate as follows:

18 On December 12, 2016, Plaintiffs filed their Amended Complaints¹ against the
19 Defendants, the United States and its contractor, Management & Training Corporation (MTC).
20 Pursuant to the court’s orders, the United States shall file responsive pleadings by January 3, 2017
21 and MTC need not file responsive pleadings. (ECF Nos. 107, 113, 55).

22 Due to a pre-planned vacation, federal holidays on December 26, 2016 and January 2,
23 2017, and to allow the parties to attempt to avoid a motion as the initial response, good cause
24
25

26 _____
27 ¹ Plaintiff Gregory Edison filed a First Amended Complaint (ECF No. 110), Plaintiff Richard
28 Nuwintore filed a Third Amended Complaint (ECF No. 117), and Plaintiff Louis Domingo filed a
Second Amended Complaint (ECF No. 58).

1 exists to continue the response date for the United States from January 3, 2017 to and including
2 February 2, 2017.²

3 Accordingly, Plaintiffs and Defendants hereby stipulate and agree as follows:

4 1. The deadline for the United States to respond to the Amended Complaints shall be
5 extended up to and including February 2, 2017.

6 2. This stipulation will not alter the date of any event or any deadline already fixed by
7 Court order.

8 DATED: December 21, 2016

FELDMAN & WALLACH, LLP

(As authorized 12/21/2016)

/s/ Jason Feldman

IAN WALLACH

JASON FELDMAN

Attorneys for Plaintiffs, Gregory Edison, Louis C.
Domingo, Richard Nuwintore

13 DATED: December 21, 2016

BURKE, WILLIAMS & SORENSEN, LLP

(As authorized 12/21/2016)

/s/ Kristina Gruenberg

SUSAN E. COLEMAN

KRISTINA GRUENBERG

Attorneys for Defendant,
Management & Training Corporation

18 DATED: December 21, 2016

PHILLIP A. TALBERT

United States Attorney

/s/ Alyson A. Berg

ALYSON A. BERG

Assistant United States Attorney

Attorneys for Defendant,
United States of America

27 ² MTC does not oppose the agreement between plaintiffs and the United States regarding the date
28 for the United States to respond to the amended complaints.

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

[PROPOSED] ORDER

Having reviewed the stipulation submitted by the parties and for good cause showing, the court hereby orders as follows:

1. The deadline for the United States to respond to the Amended Complaints shall be extended up to and including February 2, 2017.

2. This stipulation will not alter the date of any other event or any deadline already fixed by Court order.

IT IS SO ORDERED.

Dated: December 22, 2016

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE