

ARTURO J. GONZALEZ (CA SBN 121490)  
AGonzalez@mofo.com  
JESSICA L. GRANT (CA SBN 178138)  
JGrant@mofo.com  
MATTHEW A. CHIVVIS (CA SBN 251325)  
MChivvis@mofo.com  
ROBERT S. SANDOVAL (CA SBN 311032)  
RSandoval@mofo.com  
MEREDITH L. ANGUEIRA (CA SBN 333222)  
MAngueira@mofo.com  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, California 94105-2482  
Telephone: 415.268.7000

Attorneys for Plaintiffs

BALJIT ATHWAL, DALJIT ATWAL, WALTER W. WELLS  
and SCOTT McFARLANE

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

BALJIT ATHWAL and DALJIT ATWAL,

Plaintiffs,

v.

COUNTY OF STANISLAUS; CITY OF  
TURLOCK; CITY OF MODESTO; CITY OF  
CERES; STANISLAUS COUNTY OFFICE OF  
THE DISTRICT ATTORNEY; KIRK BUNCH;  
JON EVERS; TIMOTHY REDD; DALE  
LINGERFELT; STEVE JACOBSON; BIRGIT  
FLADAGER; GALEN CARROLL;

Defendants.

WALTER W. WELLS and SCOTT  
MCFARLANE

Plaintiffs,

v.

COUNTY OF STANISLAUS, ET AL.

Defendants.

Case No. 1:15-cv-00311-TLN-BAM

**JOINT STIPULATION AND  
ORDER TO EXTEND PAGE LIMIT  
FOR PLAINTIFFS' OPPOSITIONS  
TO DEFENDANTS' MOTIONS TO  
DISMISS**

Hon. Troy L. Nunley

Trial: None Set

Related to:

CASE NO. 1:20-CV-00770-TLN-BAM

CASE NO. 1:20-CV-00747-TLN-BAM

CASE NO. 1:18-cv-00496-TLN-BAM

CASE NO. 1:18-cv-01403-TLN-BAM

Case No. 1:20-cv-00770-TLN-BAM

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FRANK CARSON,  
  
Plaintiffs,  
  
v.  
  
COUNTY OF STANISLAUS, CITY OF  
MODESTO, CITY OF CERES, BIRGIT  
FLADAGER, MARLISSA FERREIRA, DAVID  
HARRIS, KIRK BUNCH, STEVE JACOBSON,  
JON EVERS, CORY BROWN, and DEREK  
PERRY, and DOES 1-25, inclusive,  
  
Defendants.

Case No. 1:20-cv-00747-TLN-BAM

GEORGIA DEFILIPPO AND CHRISTINA  
DEFILIPPO  
  
Plaintiffs,  
  
v.  
  
COUNTY OF STANISLAUS, ET AL.  
  
Defendants.

Case No. 1:18-cv-00496-TLN-BAM

EDUARDO QUINTANAR, JR.,  
  
Plaintiffs,  
  
v.  
  
COUNTY OF STANISLAUS, ET AL.  
  
Defendants.

Case No. 1:18-cv-01403-TLN-BAM

1 Defendants COUNTY OF STANISLAUS; CITY OF MODESTO; STANISLAUS  
2 COUNTY OFFICE OF THE DISTRICT ATTORNEY; BIRGIT FLADAGER; MARLISSA  
3 FERREIRA; DAVID HARRIS; KIRK BUNCH; STEVE JACOBSON; CORY BROWN; JON  
4 EVERS; TIMOTHY REDD; DALE LINGERFELT; GALEN CARROL; FROLIAN  
5 MARISCAL; LLOYD MCKINNON; GREG JONES; KENNETH BARRINGER; GALEN  
6 CARROLL; and FRANK NAVARRO (“Defendants”) and Plaintiffs ESTATE OF FRANK  
7 CARSON; GEORGIA DEFILIPPO; CHRISTINA DEFILIPPO; EDUARDO QUINTANAR, JR.;  
8 BALJIT ATHWAL; DALJIT ATHWAL; WALTER WELLS; and SCOTT MCFARLANE  
9 (“Plaintiffs”) through their respective counsel, hereby agree and stipulate as follows:

10 1. WHEREAS Plaintiffs have been served with multiple separate motions to  
11 dismiss;

12 2. WHEREAS Plaintiffs have settled their claims against City of Ceres and City of  
13 Turlock;

14 3. WHEREAS additional space is needed to respond to the arguments raised by the  
15 remaining Defendants;

16 4. All parties agree to a 25-page limit for Plaintiffs’ Oppositions to Defendants’  
17 FRCP 12(b)(6) motions to dismiss.

1 Dated: March 28, 2022

Respectfully submitted,

2 ARTURO J. GONZÁLEZ  
3 JESSICA L. GRANT  
4 MATTHEW CHIVVIS  
5 ROBERT S. SANDOVAL  
6 MEREDITH L. ANGUEIRA  
7 MORRISON & FOERSTER LLP

8 By: /s/ Arturo J. González  
9 ARTURO J. GONZÁLEZ

10 Attorneys for Plaintiffs  
11 BALJIT ATHWAL, DALJIT ATWAL,  
12 WALTER WELLS, and SCOTT  
13 MCFARLANE

14 Dated: March 28, 2022

15 ALLEN, GLAESSNER, HAZELWOOD &  
16 WERTH, LLP

17 By: \*/s/ Dale L. Allen, Jr.  
18 DALE L. ALLEN, JR.  
19 PATRICK D. MORIARTY  
20 JOHN B. ROBINSON

21 Attorneys for Defendants  
22 CITY OF MODESTO, JON EVERS, and  
23 GALLEN CARROLL

24 Dated: March 28, 2022

25 GWILLIAM, IVARY, CHIOSSO, CAVALLI  
26 & BREWER

27 By: \*/s/ Angelina M. Austin  
28 J. Gary Gwilliam  
Randall E. Strauss  
Jayme L. Walker  
Angelina M. Austin

Attorneys for Plaintiffs  
ESTATE OF FRANK CARSON, GEORGIA  
DEFILIPPO, CHRISTINA DEFILIPPO AND  
EDUARDO QUINTANAR, JR.

1 Dated: March 28, 2022

PORTER SCOTT  
A PROFESSIONAL CORPORATION

2  
3  
4 By: *\*/s/ John R. Whitefleet*  
John R. Whitefleet

5 Attorneys for Defendants  
6 COUNTY OF STANISLAUS, STANISLAUS  
7 COUNTY OFFICE OF THE DISTRICT  
8 ATTORNEY, BIRGIT FLADAGER,  
9 MARLISSA FERRIERA, DAVID HARRIS,  
KIRK BUNCH, STEVE JACOBSON, CORY  
BROWN, DALE LINGERFELT, FROLIAN  
MARISCAL, LLOYD MACKINNON, GREG  
JONES, KENNETH BARRINGER

10 *\* Parties have consented to use of their electronic signature.*  
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**ORDER**

Pursuant to the stipulation of the parties:

The page limit for Plaintiffs' Oppositions to Defendants' FRCP 12(b)(6) motions to dismiss is extended to 25.

IT IS SO ORDERED.

DATED: March 29, 2022



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Troy L. Nunley  
United States District Judge