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10                  Attorneys for Defendants COUNTY OF STANISLAUS, STANISLAUS COUNTY SHERIFF  
11                  DEPARTMENT, BIRGIT FLADAGER, ADAM CHRISTIANSON, DAVID HARRIS AND  
12                  KIRK BUNCH

13                  *[Public Entity exempt from filing fee pursuant to Government Code § 6103]*

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15                  **UNITED STATES DISTRICT COURT**  
16                  **EASTERN DISTRICT OF CALIFORNIA**

17                  PRAVEEN SINGH, an individual, and  
18                  JOYTESHNA KARAN, an individual,

19                  CASE NO. 1:15-cv-00646-GEB-BAM

20                  Plaintiffs,

21                  vs.

22                  KIRK BUNCH, an individual, FRANK  
23                  NAVARRO, an individual, JOHN EVERE,  
24                  an individual, DAVID HARRIS, BIRGIT  
25                  FLADAGER, THE COUNTY OF  
26                  STANISLAUS, a government entity, ADAM  
27                  CHRISTIANSON, STANISLAUS  
28                  COUNTY SHERIFF DEPARTMENT, a  
                        government entity, and DOES 1-100,  
                        inclusive,

29                  Defendants.

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31                  STIPULATION TO CONTINUE  
32                  DEFENDANTS COUNTY OF  
33                  STANISLAUS, STANISLAUS COUNTY  
34                  SHERIFF DEPARTMENT, BIRGIT  
35                  FLADAGER, ADAM CHRISTIANSON,  
36                  DAVID HARRIS AND KIRK BUNCH'S  
37                  MOTION TO DISMISS; [PROPOSED]  
38                  ORDER

39                  Complaint Filed: April 27, 2015

1 Plaintiffs PRAVEEN SINGH and JOYTESHNA KARAN and Defendants COUNTY OF  
2 STANISLAUS, STANISLAUS COUNTY SHERIFF DEPARTMENT, BIRGIT FLADAGER,  
3 ADAM CHRISTIANSON, DAVID HARRIS and KIRK BUNCH, by and through their respective  
4 undersigned counsel, hereby stipulate to continue Defendants' Motion to Dismiss currently  
5 scheduled for August 24, 2015 at 9:00 a.m. to September 14, 2015 at 9:00 a.m. The parties  
6 submit good cause exists to continue the motion to dismiss as an amended complaint is being  
7 contemplated to address issues raised in the motion.

8 **IT IS SO STIPULATED.**

9  
10 Dated: August 13, 2015 HESS, HESS & HERRERA, P.C.

11 By: /s/ Alejandro H. Herrera (authorized on 8/12/15)  
12 Alejandro H. Herrera  
13 Attorneys for Plaintiffs

14 Dated: August 13, 2015 PORTER SCOTT  
15 A PROFESSIONAL CORPORATION

16 By /s/ John R. Whitefleet  
17 John R. Whitefleet  
18 Attorneys for Defendants  
19 COUNTY OF STANISLAUS, STANISLAUS COUNTY  
20 SHERIFF DEPARTMENT, BIRGIT FLADAGER, ADAM  
21 CHRISTIANSON, DAVID HARRIS AND KIRK BUNCH

## **[PROPOSED] ORDER**

IT IS HEREBY ORDERED that Defendants' Motion to Dismiss is continued to September 14, 2015 at 9:00 a.m.

Dated: August 13, 2015

GARLAND E. BURRELL, JR.  
Senior United States District Judge

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