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8 **Attorneys for Defendants County**  
 9 **of Kern and Deputy Reed**

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

12 **D.G., a minor, by and through his ) CASE NO. 1:15-CV-00760 JAM-JLT**  
 13 **guardian *ad litem*, Denise Bonilla, )**  
 14 **individually and as successor-in-interest ) STIPULATION FOR EXTENSION OF TIME**  
 15 **to David Garcia, deceased; D.E.G., a ) TO FILE SETTLEMENT /DISMISSAL**  
 16 **minor, by and through her guardian *ad ) DOCUMENTS***  
 17 ***litem*, Denise Bonilla, individually and )**  
 18 **as successor-in-interest to David Garcia, )**  
 19 **deceased; G.D., a minor, by and )**  
 20 **through her guardian *ad litem*, Denise )**  
 21 **Bonilla, individually and as successor- )**  
 22 **in-interest to David Garcia, deceased; )**  
 23 **RAMONA RAMIREZ NUNEZ, )**  
 24 **individually; )**  
 25 **Plaintiffs, )**  
 26 **vs. )**  
 27 **COUNTY OF KERN; DOES 1 )**  
 28 **THROUGH 10; )**  
**Defendants. )**  
 \_\_\_\_\_ )

23 **COME NOW** the Parties in this matter, and present this Stipulation for Extension of  
 24 time to File Settlement/Dismissal Documents.

25 Plaintiffs, D.G., a minor; D.E.G., a minor; G.D., a minor; by and through their guardian  
 26 *ad litem* Denise Bonilla; and Ramona Ramirez Nunez, (hereinafter collectively “Plaintiffs”) are  
 27 jointly represented by Matthew C. Clark and Neil K. Gehlawat of Chain-Cohn-Stiles, and  
 28 Dale K. Galipo of the Law Offices of Dale K. Galipo.

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Stipulation for Extension of time to File Settlement/Dismissal Documents.

1 Defendants, County of Kern (hereinafter "County") and Deputy Robert Reed  
2 (hereinafter "Reed"), (hereinafter collectively "Defendants") are represented by Andrew C.  
3 Thomson, Office of Kern County Counsel.

4 Plaintiffs and Defendants are hereinafter collectively referred to as the "Parties."

5 **IT IS HEREBY STIPULATED:** The Parties have, and continue to, diligently  
6 attempted to secure the necessary closing documents and timely arrange annuity payments for  
7 the minors. A Release and Settlement Agreement has been prepared by Defendants and  
8 executed by Plaintiffs' and their counsel. Plaintiffs' counsel is preparing the minors'  
9 compromises, with the annuity information, for the court's approval.

10 **IT IS RESPECTFULLY REQUESTED:** that the Court issue an Order modifying the  
11 Minute Order [Doc. 75] to extend the date for filing of the Settlement/Dismissal documents, by  
12 four (4) weeks to May 19, 2017.

13  
14 Dated: April 21, 2017

**CHAIN-COHN-STILES**

15  
16 By /s/ Neil K. Gehlawat  
17 Matthew C. Clark  
18 Neil K. Gehlawat  
19 Attorneys for Plaintiffs

20  
21 Dated: April 21, 2017

**MARK L. NATIONS, INTERIM COUNTY COUNSEL**

22 By /s/ Andrew C. Thomson  
23 Andrew C. Thomson, Deputy  
24 Attorneys for Defendants County of  
25 Kern and Deputy Reed

26  
27 **IT IS SO ORDERED.**

28 Dated: April 21, 2017

/s/ John A. Mendez  
**HON. JOHN A. MENDEZ**  
UNITED STATES DISTRICT COURT JUDGE

#2365518

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Stipulation for Extension of time to File Settlement/Dismissal Documents.