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

29 DENNIS ALBA,
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31 Plaintiff,

32 vs.

33 COUNTY OF TULARE, CALIFORNIA,
34 TULARE COUNTY SHERIFF'S DEPUTY
35 RONALD CROUCH, TULARE COUNTY
36 SHERIFF'S DEPARTMENT, TULARE
37 COUNTY SHERIFF'S DEPUTY
38 SERGEANT TORRES, TULARE COUNTY
39 SHERIFF'S DEPUTY DERRICK HOOD
40 AND TULARE COUNTY SHERIFF'S
41 DEPUTY BERTOLDO,

42 Defendants.

Case Number: 1:15-cv-01492-EPG

STIPULATION TO STAY ENTIRE
MATTER, INCLUDING ALL
DATES, INCLUDING BUT NOT
LIMITED TO DISCOVERY DATES,
DISCOVERY DISPUTE DATES,
AND ALL OTHER CUT-OFF
DATES AND APPEARANCE
DATES, AND SET NEW
SCHEDULING CONFERENCE;
ORDER

Trial Date: October 17, 2017

*Exempt from Filing Fees Pursuant
to Government Code §6103*

THE PARTIES HERETO SIPULATE to request the Court for an Order hereby

staying this action in its entirety, including, but not limited to all dates, cut-off dates, discovery dates, and discovery dispute dates and to vacate the trial date currently set for October 17, 2017.

The parties further request that the Court set a new Scheduling Conference in this matter at a date and time after March 31, 2017.

1. The parties hereby stipulate and agree that good cause exists to stay the proceedings and request the Court to set a new and further Scheduling Conference. The parties agree that a stay is necessary to protect the rights of the parties to fully and fairly litigate this case because Plaintiff's attorney is currently unavailable due to a serious health condition. Said unavailability is scheduled to extend until on or after March 31, 2017.

2. Plaintiff's attorney of record, William A. Romaine, has authorized Attorney David Douglas Doyle, Bar No. 100595, of the firm of Doyle & Fortune, 1233 W. Shaw Avenue #106, Fresno, California (559) 227-2600 to specially appear and to sign this Stipulation in order to secure the stay in this matter on his behalf.

Dated: January 30, 2017

KATHLEEN BALES-LANGE
Tulare County Counsel

By ____/s/_____
JUDITH D. CHAPMAN
Deputy County Counsel

Dated: January 27, 2017

DOYLE & FORTUNE

By ____/s/_____
DAVID D. DOYLE
William A. Romaine, Attorney for
Plaintiff.

1 **ORDER**

2 Good cause appearing, the Court hereby stays the proceedings and vacates all
3 deadlines and dates currently set in this matter, including the trial date currently set for
4 October 17, 2017. Any discovery disputes pending between the parties are hereby also
5 suspended until a new Scheduling Conference may be set by this Court at a date and
6 time after March 31, 2017.

7 The Court sets new Scheduling Conference for **April 17, 2017 at 10:30 a.m.** in
8 Department 10. The parties shall file a joint scheduling report no later than one week
9 before the Scheduling Conference and shall email a copy of the report to
10 epgorders@caed.uscourts.gov.

11
12 IT IS SO ORDERED.

13 Dated: **January 30, 2017**

14 /s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE