

1 William A. Romaine, #126966
2 Law Office of William A. Romaine
3 206 West Lacey Blvd. #309
4 Hanford, CA 93230
5 Telephone: (559) 582-9360
6 Facsimile: (559) 582-9350

7 Attorney for Plaintiff

8 KATHLEEN BALES-LANGE, #094765
9 County Counsel for the County of Tulare
10 Judith D. Chapman, #169479
11 Deputy County Counsel
12 2900 West Burrel, County Civic Center
13 Visalia, California 93291
14 Telephone: (559) 733-6263
15 Facsimile: (559) 737-4319

16 Attorneys for Defendant County of Tulare

17 UNITED STATES DISTRICT COURT
18 EASTERN DISTRICT OF CALIFORNIA – FRESNO

19 DENNIS ALBA,
20 Plaintiffs,

21 vs.

22 COUNTY OF TULARE, CALIFORNIA,
23 TULARE COUNTY SHERIFF'S DEPUTY
24 RONALD CROUCH, TULARE COUNTY
25 SHERIFF'S DEPARTMENT, TULARE
26 COUNTY SHERIFF'S DEPUTY
27 SERGEANT TORRES, TULARE COUNTY
28 SHERIFF'S DEPUTY DERRICK HOOD
29 AND TULARE COUNTY SHERIFF'S
30 DEPUTY BERTOLDO,

31 Defendants.

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

**PARTIES' JOINT STIPULATION
AND ORDER TO CONTINUE THE
MANDATORY SCHEDULING
CONFERENCE HEARING DATE
AND EXTEND TIME FOR FILING
OF RESPONSE TO THE
COMPLAINT**

Date: January 14, 2016

Time: 9:00 a.m.

Courtroom: 10

Erika J. Grosjean

U.S. Magistrate Judge

JOINT STIPULATION

1 Plaintiff, DENNIS ALBA by and through his attorneys of record and Defendants, COUNTY
2 OF TULARE, CALIFORNIA, TULARE COUNTY SHERIFF'S DEPUTY RONALD CROUCH,
3 TULARE COUNTY SHERIFF'S DEPARTMENT, TULARE COUNTY SHERIFF'S DEPUTY
4 SERGEANT TORRES, TULARE COUNTY SHERIFF'S DEPUTY DERRICK HOOD AND
5 TULARE COUNTY SHERIFF'S DEPUTY BERTOLDO , by and through Tulare County Counsel,
6 Deputy County Counsel, Judith D. Chapman, stipulate as follows:

7 WHEREAS Defendant was served with the Summons and Complaint on December 15, 2015
8 and needs time to gather information regarding the Plaintiff's claims. In order to meaningfully
9 participate in the meet and confer and the scheduling conference and to prepare a proper response to
10 the Complaint;

11 WHEREAS the parties are required pursuant to Fed. R. Civ. P. 26(f), to meet and confer at
12 least twenty-one (21) days prior to the Mandatory Scheduling Conference, the parties agree that
13 counsel for Defendant will be able to meaningfully participate in the conference after she has had
14 time to review the case documents and information.

15 THEREFORE the parties respectfully request that the time to file a response to the
16 Complaint be extended for 18 days and Mandatory Scheduling Conference currently scheduled for
17 January 14, 2016 at 9:00 a.m. be continued for a period of 30 days.

18 IT IS SO STIPULATED BY THE ATTORNEYS OF RECORD AND NAMED HEREIN.

19
20 Dated: 12/23/15

LAW OFFICE OF WILLIAM A. ROMAINE

21
22 /s/
William A. Romaine, Attorney for
23 Plaintiff

24 Dated: 12/23/15

KATHLEEN BALES-LANGE
25 County Counsel

26
27 /s/
Judith D. Chapman, Attorney for
28 Defendant County of Tulare

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

ORDER

Based on the parties' Stipulation to extend time to file the responsive pleading and Continue Mandatory Scheduling Conference, and good cause appearing, IT IS HEREBY ORDERED that: The Mandatory Scheduling Conference in this matter, currently set for January 14, 2016, is vacated and continued to February 18, 2016 at 9:00 a.m., in Department 10. Further, the responsive pleading is now due on or before February 1, 2016.

IT IS SO ORDERED.

Dated: December 28, 2015

/s/ Eric P. Gray
UNITED STATES MAGISTRATE JUDGE