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21 Attorneys for Defendant
22 SHERIFF DONNY YOUNGBLOOD

23 UNITED STATES DISTRICT COURT
24 EASTERN DISTRICT OF CALIFORNIA

25 DARREN WONDERLY, INDIVIDUALLY
26 AND ON BEHALF OF THOSE SIMILARLY
27 SITUATED,

28 Plaintiff,

vs.

SHERIFF DONNY YOUNGBLOOD AND
DOES 1 through 50,

Defendants.

CASE NO. 1:16-cv-01621-JLT

**JOINT STIPULATION TO CONTINUE
STAY OF PROCEEDINGS; [~~PROPOSED~~]
ORDER
(Doc. 108)**

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1 The parties to the above-captioned action, by and through their attorneys of record, hereby
2 enter into the below stipulation with regard to the following facts and circumstances:

3 WHEREAS, Plaintiff DARREN WONDERLY (“Plaintiff”), filed a complaint against
4 Defendant, SHERIFF DONNY YOUNGBLOOD, (“Defendant”) on or about October 26, 2016;

5 WHEREAS, on June 30 and September 21, 2021, the Court granted the Parties’ request to
6 stay the proceedings and vacate future dates in order for the Kern County Board of Supervisors to
7 authorize a proposed Settlement between the Parties and for the Parties to prepare settlement
8 documents;

9 WHEREAS, the Kern County Board of Supervisors has authorized the Parties to settle the
10 claims;

11 WHEREAS, the Parties have largely finalized settlement documents and will be obtaining
12 the signatures of the parties shortly;

13 THEREFORE, the Parties agree to continue a stay of the case in order to file the
14 settlement documents and present to the Court a motion for approval of the Settlement.

15 IT IS STIPULATED THAT:

- 16 1. In order to preserve judicial economy, as well as prevent any unnecessary
17 litigation costs to Plaintiff and Defendant, all proceedings, including but not
18 limited to written discovery, depositions, subpoena of records, all motions and
19 hearings, and all deadlines related to motions and hearings, be stayed pending the
20 parties submitting a Joint Stipulation of Settlement to the Court for approval;
- 21 2. If the proposed Joint Stipulation of Settlement is not ultimately approved by the
22 Court, this stipulation shall no longer be binding, and the case shall proceed per
23 applicable Federal Rules of Civil Procedure and the local rules of the United States
24 District Court of the Eastern District of California. In this event, the current
25 deadlines will be reset by the Order of the Court to avoid prejudice to any parties.
- 26 3. The Parties will submit the Joint Stipulation of Settlement to the Court by
27 December 10, 2021.

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4. Nothing in this Stipulation and Order is intended to limit or waive any rights the Parties may have.

IT IS SO STIPULATED.

Dated: November 4, 2021

MAHONEY LAW GROUP, APC

By: /s/ Katherine J. Odenbreit (as authorized on 11.04.21)

KEVIN MAHONEY
KATHERINE J. ODENBREIT

Attorneys for Plaintiff
DARREN WONDERLY

Dated: November 4, 2021

JACKSON LEWIS P.C.

By: /s/ Nathan W. Austin

NATHAN W. AUSTIN
EVAN D. BEECHER

Attorneys for Defendant
SHERIFF DONNY YOUNGBLOOD

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ORDER

Based upon the stipulation of the parties and good cause appearing, the Court ORDERS:

1. The Parties are to submit their motion for approval of the settlement and Joint Stipulation of Sentiment no later than December 10, 2021.

IT IS SO ORDERED.

Dated: November 5, 2021

/s/ Jennifer L. Thurston
CHIEF UNITED STATES MAGISTRATE JUDGE