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7 Attorneys for Defendants
 CITY OF MODESTO AND JON EVERS

8
 9 UNITED STATES DISTRICT COURT
 10 EASTERN DISTRICT OF CALIFORNIA

12 FRANK CARSON,

13 Plaintiff,

14 v.

15 COUNTY OF STANISLAUS, CITY OF
 MODESTO, CITY OF CERES, BIRGIT
 16 FLADAGER, MARLISSA FERREIRA,
 DAVID HARRIS, KIRK BUNCH,
 17 STEVE JACOBSON, JON EVERS,
 CORY BROWN, and DEREK PERRY,
 18 and DOES 1-25, inclusive,

19 Defendants.

Case No. 1:20-cv-00747-TLN

**JOINT STIPULATION AND [PROPOSED]
 ORDER TO CONTINUE DEADLINE TO
 RESPOND TO COMPLAINT**

Hon. Troy L. Nunley

Trial: None Set

21 GEORGIA DEFILIPPO AND
 CHRISTINA DEFILIPPO,

22 Plaintiffs,

23 v.

24 COUNTY OF STANISLAUS, ET AL.

25 Defendants
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Case No. 1:18-cv-00496-TLN-BAM

ALLEN, GLAESSNER, HAZELWOOD & WERTH, LLP
 180 Montgomery Street, Suite 1200
 San Francisco, California 94104

1 EDUARDO QUINTANAR, JR.,
2 Plaintiffs,
3 v.
4 COUNTY OF STANISLAUS, ET AL.
5 Defendants.
6

Case No. 1:18-cv-01403-TLN-BAM

7
8 BALJIT ATHWAL and DALJIT
9 ATWAL,
10 Plaintiffs,
11 v.
12 COUNTY OF STANISLAUS; CITY
13 OF TURLOCK; CITY OF MODESTO;
14 CITY OF CERES; STANISLAUS
15 COUNTY OFFICE OF THE
16 DISTRICT ATTORNEY; KIRK
17 BUNCH; JON EVERS; TIMOTHY
18 REDD; DALE LINGERFELT; STEVE
19 JACOBSON; BIRGIT FLADAGER;
20 GALEN CARROLL;
21 Defendants.

Case No. 1:15-cv-00311-TLN-BAM

19 WALTER W. WELLS and SCOTT
20 MCFARLANE
21 Plaintiffs,
22 v.
23 COUNTY OF STANISLAUS, ET AL.
24 Defendants.
25

Case No. 1:20-cv-00770-TLN-BAM

26 Defendants COUNTY OF STANISLAUS; CITY OF MODESTO; CITY OF TURLOCK;
27 CITY OF CERES; STANISLAUS COUNTY OFFICE OF THE DISTRICT ATTORNEY;
28

ALLEN, GLAESSNER, HAZELWOOD & WERTH, LLP
180 Montgomery Street, Suite 1200
San Francisco, California 94104

1 BIRGIT FLADAGER; MARLISSA FERREIRA; DAVID HARRIS; KIRK BUNCH; STEVE
 2 JACOBSON; CORY BROWN; JON EVERS; TIMOTHY REDD; DALE LINGERFELT;
 3 GALEN CARROL; FROLIAN MARISCAL; LLOYD MCKINNON; GREG JONES;
 4 KENNETH BARRINGER; GALEN CARROLL; FRANK NAVARRO; and TIMOTHY REDD
 5 (“Defendants”) and Plaintiffs ESTATE OF FRANK CARSON; GEORGIA DEFILIPPO;
 6 CHRISTINA DEFILIPPO; EDUARDO QUINTANAR, JR.; BALJIT ATHWAL; DALJIT
 7 ATHWAL; WALTER WELLS; SCOTT MCFARLANE (“Plaintiffs”) through their respective
 8 counsel, hereby agree and stipulate as follows:

- 9 1. WHEREAS on September 29, 2021, the Honorable Judge Nunley dismissed
 10 plaintiffs’ complaints with leave to file an amended complaint within 30 days;
- 11 2. WHEREAS All parties agreed and the court ordered that the deadline for filing the
 12 amended complaints would be continued to November 18, 2021;
- 13 3. WHEREAS plaintiffs filed their amended complaints prior to the November 18,
 14 2021
- 15 3. WHEREAS Defendants’ responsive pleading was scheduled to be filed no later
 16 than 30 days after service of the plaintiffs’ Amended Complaints, which was December 17, 2021.
- 17 4. All Defendants plan to file FRCP 12(b)(6) motions to dismiss.

18 The stipulated briefing schedule is as follows:

19 Defendants’ FRCP 12(b)(6) motions to dismiss	January 10, 2022
20 Plaintiffs’ Oppositions to Defendants’ FRCP	March 11, 2022
21 12(b)(6) motions to dismiss	
22 Defendants’ Replies (if any)	April 11, 2022
23 Proposed hearing date	April 21, 2022 at 2 p.m.

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Respectfully submitted,

Dated: December 3, 2021

ALLEN, GLAESSNER,
HAZELWOOD & WERTH, LLP

By: /s/Patrick D. Moriarty
DALE L. ALLEN, JR.
PATRICK D. MORIARTY
JOHN B. ROBINSON
Attorneys for Defendants
CITY OF MODESTO AND JON EVERS

Dated: [Click here to enter a date.](#)

GWILLIAM, IVARY, CHIOSSO, CAVALLI &
BREWER

By: */s/Angelina M. Austin
J. Gary Gwilliam
Randall E. Strauss
Jayme L. Walker
Angelina M. Austin
Attorneys for Plaintiffs
ESTATE OF FRANK CARSON, GEORGIA
DEFILIPPO, CHRISTINA DEFILIPPO AND
EDUARDO QUINTANAR, JR.

Dated: December 3, 2021

MORRISON & FOERSTER LLP

By: */s/Arturo Gonzalez
Arturo Gonzalez
Attorney for Plaintiffs
BALJIT ATHWAL, DALJIT ATWAL,
WALTER WELLS AND SCOTT
MCFARLANE

Dated: December 3, 2021

PORTER SCOTT
A PROFESSIONAL CORPORATION

By: */s/John Whitefleet
John R. Whitefleet
Attorneys for Defendants
COUNTY OF STANISLAUS,
STANISLAUS COUNTY OFFICE OF THE
DISTRICT ATTORNEY, BIRGIT

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FLADAGER, MARLISSA FERRIERA,
DAVID HARRIS, KIRK BUNCH, STEVE
JACOBSON, CORY BROWN, DALE
LINGERFELT, FROLIAN MARISCAL,
LLOYD MACKINNON, GREG JONES,
KENNETH BARRINGER

Dated: December 3, 2021

ARATA SWINGLE VAN EGMOND &
HEITLINGER

By: */s/Bradley J. Swingle
Bradley J. Swingle
Attorneys for Defendants
CITY OF TURLOCK, CITY OF CERES,
FRANK NAVARRO, AND TIMOTHY REDD

** Parties have consented to use of their electronic signature.*

ORDER

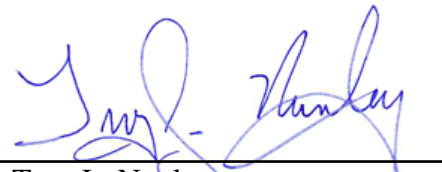
Pursuant to the stipulation of the parties:

The stipulated briefing schedule is as follows:

Defendants' FRCP 12(b)(6) motions to dismiss	January 10, 2022
Plaintiffs' Oppositions to Defendants' FRCP 12(b)(6) motions to dismiss	March 11, 2022
Defendants' Replies (if any)	April 11, 2022
Hearing Date	April 21, 2022 at 2 p.m.

IT IS SO ORDERED.

Dated: December 8, 2021


Troy L. Nunley
United States District Judge