7 8 9 10 11 12 13 14	GEOFFREY THOMAS HOLTZ – 191370 BINGHAM MCCUTCHEN LLP Three Embarcadero Center San Francisco, California 94111-4067 Telephone: (415) 393-2000 Facsimile: (415) 393-2086 DONALD SPECTER – 83925 PRISON LAW OFFICE 1917 Fifth Street Berkeley, California 94710-1916 Telephone: (510) 280-2621 Facsimile: (510) 280-2704 MICHAEL W. BIEN – 96891 ERNEST GALVAN – 196065 KENNETH M. WALCZAK– 247389 ROSEN BIEN GALVAN & GRUNFELD LLP 315 Montgomery Street, Tenth Floor San Francisco, California 94104-1823 Telephone: (415) 433-6830 Facsimile: (415) 433-7104 Attorneys for Plaintiffs UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA		
15	EASTERN DISTRICT OF CALIFORNIA		
16	SACRAMENTO DIVISION		
17			
18	JERRY VALDIVIA, et al.,	Case No. Civ. S-94-0671 LKK-GGH	
19	Plaintiffs,	STIPULATION AND ORDER EXTENDING TIME TO RESPOND TO	
20	V.	SPECIAL MASTER'S 13TH REPORT	
21	EDMUND G. BROWN, JR., et al.,	Judge: Hon. Lawrence K. Karlton	
22	Defendants.		
23			
24			
25			
26			
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	STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO SPECIAL MASTER'S 13TH REPORT – Case No. Civ. S-94-0671 LKK/GGH Dockets.Justia.col		

1	THE PARTIES, BY AND THROUGH THEIR COUNSEL, HEREBY		
2	STIPULATE AND AGREE AS FOLLOWS:		
3	The Special Master served his Thirteenth Report with the parties on December 17,		
4	2012. Under the Order of Reference, "The Special Master's reports shall be final unless,		
5	no later than twenty (20) days after service of the final report, a party files written		
6	objections with the Court." Docket No. 1234, 3:17-19.		
7	The parties have met and conferred, and respectfully request that the Court extend		
8	this deadline, allowing both parties until January 25, 2013 to respond to the Thirteenth		
9	Report. The purpose of this extension is to facilitate the parties' pre-paid holiday travel,		
10	and to accommodate conflicting deadlines faced by Plaintiffs' counsel in other matters.		
11	DATED: December 21, 2012 Respectfully submitted,		
12	ROSEN BIEN GALVAN & GRUNFELD LLP		
13			
14	By: <u>s/Kenneth Walczak</u>		
15	Kenneth M. Walczak		
16	Attorneys for Plaintiffs		
17			
18	DATED: December 21, 2012 HANSON BRIDGETT, LLP		
19	By: s/ Samantha Wolff		
20	Samantha Wolff		
21	Attorneys for Defendants		
22			
23	The Special Master's Thirteenth Report shall be final unless a party files written		
24	objections with the Court no later than January 25, 2013. IT IS SO ORDERED.		
25			
26	DATED: January 2, 2013		
27	SENIOR JUDGE UNITED STATES DISTRICT COURT		
28	1		
	STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO SPECIAL MASTER'S 13TH REPORT – Case No. Civ. S-94-0671 LKK/GGH		