

1 MICHAEL E. ADAMS (SBN: 47278)
LAW OFFICES OF MICHAEL E. ADAMS
2 702 Marshall Street, Suite 300
Redwood City, CA 94063
3 Telephone: (650) 599-9463
Fax: (650) 599-9785

4 Attorney for Plaintiff NELSON ANTHOINE

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6 UNITED STATES DISTRICT COURT
7 EASTERN DISTRICT OF CALIFORNIA
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10 NELSON H. ANTHOINE,

11 Plaintiff,

12
13 v.

14 NORTH CENTRAL COUNTIES
15 CONSORTIUM, LORI BROWN, and
16 CINDY NEWTON,

17 Defendants.
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Case No. 2:06-CV-01169-DFL-KJM

**STIPULATION TO EXTEND
TIME FOR COMPLETION OF
SETTLEMENT; SUPPORTING
DECLARATION; ORDER**

19 The parties hereto, by and through their respective undersigned counsel, hereby
20 stipulate, subject to court approval, to extend from April 8, 2011 to April 30, 2011 the
21 deadline for the parties to fully implement their settlement and file a stipulated dismissal.
22 The reason for this stipulation, as further detailed in the supporting declaration below, is
23 that the settlement agreement is not yet fully signed and implemented, and the parties
24 anticipate that the remaining signatures and implementation will be completed within
25 approximately three weeks.

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27 ///

1 DATED: March 9, 2011

DATED: March 9, 2011

2 /s/ Michael E. Adams

/s/ Mark P. Grajski

3 MICHAEL E. ADAMS
4 Attorney for Plaintiff
5 NELSON H. ANTHOINE

MARK P. GRAJSKI
Attorney for Defendants
NORTH CENTRAL COUNTIES
CONSORTIUM, LORI BROWN,
and CINDY NEWTON

7 **SUPPORTING DECLARATION**

8 I, MICHAEL E. ADAMS, hereby declare:

9 1. I am the attorney of record herein for Plaintiff Nelson Anthoine.

10 2. The written settlement agreement between the parties has thus far been signed
11 by Plaintiff and on behalf of Defendant North Central Counties Consortium ("NCCC"),
12 and I have received two of the three settlement checks that NCCC has undertaken to
13 issue. Opposing counsel, Mark Grajski, assures me that, by next week, I will be receiving
14 the remaining settlement check, as well as copies of the settlement agreement signed by
15 Defendants Lori Brown and Cindy Newton. I anticipate that, once the settlement checks
16 are deposited, it may take 7-10 days for them to clear. Once the checks all clear, I will be
17 in a position to join with Mr. Grajski in filing a stipulation for dismissal of this entire
18 case.

19 I declare under penalty of perjury that the foregoing is true and correct. Signed
20 this 7th day of April, 2011 in Redwood City, CA.

21 /s/ Michael E. Adams

22 MICHAEL E. ADAMS

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ORDER

The parties so stipulating, and good cause appearing,
IT IS HEREBY ORDERED that the deadline for full implementation of the settlement
and filing a stipulation for dismissal is extended from April 8 to April 30, 2011.

Dated: April 11, 2011

/s/ John A. Mendez
HON. JOHN A. MENDEZ
U.S. DISTRICT COURT JUDGE