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12  
 13 IN THE UNITED STATES DISTRICT COURT  
 14 FOR THE EASTERN DISTRICT OF CALIFORNIA  
 15 (Sacramento Division)

16	BRIGIT BARNES, individually and as	)	Case No. 2:07 CV 01678 JAM-JFM
17	Guardian Ad Litem for minor children	)	
18	R.X. and M.X, JERRY BARNES,	)	
19		)	STIPULATION AND ORDER RE:
20	Plaintiffs,	)	EXTENSION OF TIME TO FILE
21		)	OPPOSITION AND REPLY ON
22	v.	)	DEFENDANTS' SUMMARY
23		)	JUDGMENT MOTION [Dkt.#64]
24	COUNTY OF PLACER, et al.,	)	
25		)	
	Defendants.	)	
		)	

26 The parties hereto, by and through their attorneys of record, do hereby agree and  
 27 stipulate as set forth below, based on the following recital of facts, and request this court order  
 28 same;  
 29

1 Recitals:

2 On July 12<sup>th</sup>, 2009, an associate by the name of Sonia Chabra, employed in the law  
3 office of plaintiffs' counsel, suffered a terrible head injury in Santa Cruz, California. So  
4 serious were here injuries that she was transported by Life-Flight (by helicopter) to Santa  
5 Clara Valley Medical Center. She remained in the Intensive Care Unit for seven days, and  
6 was released only last week to her relatives care in Los Angeles, California. Her return to  
7 work is expected at best to be two weeks longer from this point in time.

8  
9 The office of plaintiffs' counsel has only three attorneys, thus Ms. Chabra's unplanned  
10 and involuntary departure created significant havoc with the distribution of tasks and  
11 obligations related to pending cases in the office of plaintiffs' counsel. One significant  
12 aspect, was that a number of hearings and appearances required to be attended in the Los  
13 Angeles and Riverside County areas, which were to be attended by Ms. Chabra, had to be  
14 attended by lead counsel in this matter, Mr. Robert Powell. Mr. Powell has in fact now spent  
15 seven of the past 13 work days in the Los Angeles area, in matters in both juvenile courts in  
16 Riverside County, and Federal Courts in Los Angeles.

17 This has severely hampered preparation of a response to the defendants currently  
18 pending Motion for Summary Judgment.

19  
20 Based on the foregoing, the parties, by and through counsel, hereby stipulate and agree,  
21 and request this court order as follows:

22 1. Plaintiffs may have through July 31<sup>st</sup>, 2009, to file any Opposition to the Defendants  
23 Motion for Summary Judgment filed July 10<sup>th</sup>, 2009. Additional service required under the  
24 Local Rules of this court, beyond that provided by e-filing alone, may be made on defendants'  
25 counsel by e-mail with PDF attachments.

1 2. Defendants may have through August 7<sup>th</sup>, 2009, to file any Reply to the Plaintiffs'  
2 Opposition to the Defendants Motion for Summary Judgment filed July 10<sup>th</sup>, 2009.  
3 Additional service required under the Local Rules of this court, beyond that provided by e-  
4 filing alone, may be made on plaintiffs' counsel by e-mail with PDF attachments.

5 **IT IS SO STIPULATED.**

6 Date: 7/29/09

7 /S/ David M. Huskey  
8 David M. Huskey, Esq.  
9 Attorney for Defendants

10 Date: 7/29/09

11 /S/ Robert R. Powell  
12 Robert R. Powell, Esq.  
13 Attorney for Plaintiffs

14 **ORDER**

15 Based on the foregoing stipulation of the parties, and good cause appearing therefore,  
16 the court hereby adopts the stipulation of the parties as an order of this court.

17 **IT IS SO ORDERED.**

18 Date: 7/29/2009

19 /s/ John A. Mendez  
20 JUDGE JOHN A. MENDEZ  
21 EASTERN DISTRICT COURT OF  
22 CALIFORNIA - SACRAMENTO