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5 Attorneys for Plaintiff
 LUIS VALENZUELA RODRIGUEZ

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UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF CALIFORNIA
 SACRAMENTO DIVISION

LUIS VALENZUELA RODRIGUEZ,
 Plaintiff,
 v.
 JAMES TILTON, et al.,
 Defendants.

Case No. 2:08-cv-01028-GEB-AC

STIPULATION AND ~~PROPOSED~~
 ORDER RE REQUEST TO EXTEND
 TIME TO FILE JOINT STATUS REPORT

1 The current deadline for the parties to file their joint status report is February 3, 2016.
2 (Docket No. 230). Counsel for the parties have worked cooperatively to date and have even
3 discussed grounds for potential amendment of the operative pleadings. Stipulation Exhibit 1
4 corroborates that cooperation and shows recent unexpected developments giving rise to this
5 Stipulation.

6 This request for a 30-day continuance of the joint status report filing deadline is made now
7 because counsel for the parties were only able to confirm as recently as yesterday (February 2,
8 2016) that incarcerated Plaintiff Luis Rodriguez was recently, unexpectedly hospitalized on
9 January 24, 2016 as an in-patient at TriCity Hospital in San Diego. Plaintiff's counsel had been
10 curious as to why Plaintiff had not contacted counsel on expected dates to discuss his case -- this
11 hospitalization is the reason why discussions have not been possible. Reports are that the
12 hospitalization may last as long as two weeks from February 1, 2016.

13 The February 3, 2016 joint status report submission date *had been* deliberately selected by
14 Plaintiff's counsel because: 1) Plaintiff was not hospitalized at the time the last request for an
15 extension was made, this hospitalization was not expected, thus discussions with Plaintiff
16 concerning his case were set and possible, and 2) Plaintiff's counsel commences a three week
17 period of leave from February 5, 2016 through February 29, 2016. The plan and intent was to
18 complete discussions with Plaintiff and submit the Joint Statement prior to Plaintiff's counsel's
19 leave beginning February 5. With these recent unexpected developments preventing completion
20 of discussion with Plaintiff and meet-and-confer on a preparation of a complete Joint Statement, it
21 is not possible for counsel for the parties to meet the February 3, 2016 deadline.

22 For these reasons, the parties request a 30 day continuation of the deadline to complete the
23 Joint Status Report, until March 4, 2016.

24
25 Although the file has been reviewed, Plaintiff's pro bono counsel has not had a full and
26 complete opportunity to discuss with Plaintiff (who is incarcerated in San Diego County) the
27 outcome of counsel's review and recommendations for next steps. Plaintiff's pro bono counsel
28 has arranged to speak with Plaintiff, who has limited access to telephones. Counsel anticipates

1 that a 30-day continuance will accommodate Plaintiff's and Plaintiff's counsel's schedules to
2 complete the joint statement.

3 For these reasons, the parties have stipulated to and request an extension to March 4,
4 2016, to ensure that Plaintiff's pro bono counsel has adequate opportunity to discuss the case with
5 his client. No trial date has been set in this case.

6
7 DATED: February 3, 2016

8 STOEL RIVES LLP

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10 By: /s/ Thomas A. Woods
11 THOMAS A. WOODS
12 Attorneys for Plaintiff
LUIS VALENZUELA RODRIGUEZ

13 DATED: February 3, 2016

14 WILLIAMS & ASSOCIATES

15
16 By: /s/ Matthew Ross Wilson
17 (as authorized on February 3, 2016)
18 MATTHEW ROSS WILSON
19 Attorneys for Defendants
20 STOREY, GALLOWAY, DAVIS,
21 VILLALVA, PEIRI, SMITH, ZIEBERT,
22 HAMILTON, SANTOS, CHAVEZ,
23 LINDE, BUENO, WOHLERS,
24 BRIMHALL, JOHNSON, POWELL,
25 TAYLOR, RODGERS, MOLIN (sued
26 herein as "Mullen"), AYERS (TUCKER)
27 and REYES
28

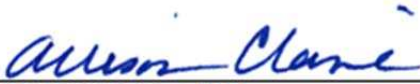
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~~PROPOSED~~ ORDER

Based on the parties' stipulation, and good cause appearing, IT IS HEREBY ORDERED that the request is granted and the parties are to file a joint status report on or before March 4, 2016.

IT IS SO ORDERED.

DATED: February 3, 2016



ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE