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11
 12 UNITED STATES DISTRICT COURT
 13 FOR THE EASTERN DISTRICT OF CALIFORNIA
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FENWICK & WEST LLP
ATTORNEYS AT LAW

15 TAI HUYNH,
 16
 Plaintiff,
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 v.
 18 SUSAN HUBBARD, et al.,
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 Defendants.
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Case No.: 2:09-cv-1979 MCE CKD P
**STIPULATION AND [PROPOSED]
 ORDER FOR EXTENDING
 DEADLINE TO FILE
 DISPOSITIONAL DOCUMENTS
 PER DKT. NO. 94**

1 Plaintiff Tai Huynh and Defendants, pursuant to Local Rules 143 and 144, hereby
2 stipulate as follows:

3 The parties appeared before the Court for a settlement conference on November 30, 2017.
4 At that conference, pursuant to representations by counsel for the parties, the Court determined
5 that the matter was settled and ordered dispositional documents to be filed not later than 90 days
6 thereafter, or March 6, 2018. Dkt. No. 94.

7 On March 7, 2018, after having exchanged drafts of a settlement agreement and
8 conferring via telephone, the parties filed a stipulation to extend the time to file dispositional
9 document by 60 days to May 7, 2017.

10 The parties reached an agreement in principle in which the parties will submit
11 dispositional documents to the court after performance of certain terms of the settlement
12 agreement. In order to permit the parties time to execute the agreement and complete
13 performance these terms of the agreement, the parties stipulated to and the Court ordered an
14 extension of the deadline to file dispositional documents by 120 days, to September 4, 2018.

15 The parties have since executed the agreement and believe that each of the terms of the
16 settlement agreement have been performed. In order to permit Mr. Huynh, who is currently
17 located at California Men's Colony State Prison, an opportunity to confirm receipt of payment
18 subject to the terms of the settlement agreement, the parties hereby stipulate, subject to the
19 Court's approval, to extend the deadline to file dispositional documents by 30 days.

20 Good cause exists for the extension as the parties, through their respective counsel, have
21 worked diligently to complete the settlement agreement and perform all terms prior to the
22 September 4, 2018 deadline. Additional time is requested in order to permit Mr. Huynh sufficient
23 time to confirm receipt of payment.

24 **NOW THEREFORE, IT IS HEREBY STIPULATED**, by and between the parties, and
25 subject to the Court's approval, that the deadline to file dispositional documents is extended by
26 30 days.

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Dated: September 4, 2018

FENWICK & WEST LLP

By: s/ Geoffrey R. Miller
Geoffrey R. Miller

Attorneys for TAI HUYNH

Dated: September 4, 2018

XAVIER BECERRA
Attorney General of California

By: s/ Joseph R. Wheeler

JOSEPH R. WHEELER
Deputy Attorney General

Attorneys for Defendants

ATTESTATION OF SIGNATURES

I hereby attest that the concurrence in the filing of this document has been obtained from the signatory indicated by a “conformed” signature (/s/) within this e-filed document.

/s/ Geoffrey R. Miller

Geoffrey R. Miller

ORDER

Pursuant to the foregoing stipulation, **IT IS SO ORDERED.**

Dated: September 5, 2018.



Honorable Edmund F. Brennan
United States Magistrate Judge