

1 THE O'MARA LAW FIRM, P.C.  
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 5 Attorney for Simmone Graham

6  
 7 **UNITED STATES DISTRICT COURT**  
 8 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

9 \* \* \*

10 SIMMONE GRAHAM aka SIMMONE )  
 11 ADELYN CORAHAM, )  
 12 )  
 Plaintiff, )

Case No. 2:10-cv-02335-JAM-KJM

13 vs. )

**STIPULATION TO CONTINUE  
 DEADLINE TO FILE RESPONSIVE  
 PLEADINGS**

14 THE CITY OF SOUTH LAKE TAHOE AND )  
 15 THE CITY OF SOUTH LAKE TAHOE )  
 POLICE DEPARTMENT (SLTPD); THE )  
 16 STATE OF CALIFORNIA AND THE )  
 CALIFORNIA HIGHWAY PATROL (CHP); )  
 17 THE COUNTY OF EL DORADO AND THE )  
 EL DORADO COUNTY SHERIFF'S )  
 DEPARMTNET; TERRY DANIELS, )  
 18 individually and in his capacity as South Lake )  
 Tahoe Chief of Police; D. ROGERS, )  
 19 individually and in his capacity as a CHP law )  
 enforcement Officer, I.D. No. 15421; D. )  
 20 LOPEZ, individually and in his capacity as a )  
 CHP law enforcement officer, I.D. No. 13833; )  
 21 MARTAIM (first name or initial unknown), )  
 individually and in his capacity as a CHP law )  
 enforcement officer, I.D. No. 13126; V. )  
 22 LAMBRES, individually and in his capacity as )  
 a CHP Sergeant or law enforcement officer, )  
 23 I.D. No. 9909; V. SHERRY, individually and )  
 in his capacity as a CHP law enforcement )  
 24 officer, I.D. No. 12361, and DOES 1 through )  
 20, )

25 )  
 26 Defendants. )  
 27 )  
 28 )

1 It is stipulated by and between all parties, by and through their respective counsel, that the  
2 deadline to file a responsive pleading for the City of South Lake Tahoe, the City of South Lake  
3 Tahoe Police Department, and Terry Daniels in this action should be continued to February 11,  
4 2011.

5 **STIPULATION TO CONTINUE DEADLINE TO FILE RESPONSIVE PLEADING**

6 Pursuant to this stipulation, the parties request this Court to continue the deadline to file a  
7 responsive pleading until February 11, 2011.

8 Dated: January 31, 2011.  
9 THE O'MARA LAW FIRM, P.C.

Dated: January 31, 2011.  
CITY ATTORNEY'S OFFICE FOR THE  
CITY OF SOUTH LAKE TAHOE

10  
11 /s/ William M. O'Mara  
12 WILLIAM M. O'MARA, ESQ.

/s/ Nira Feeley  
NIRA FEELEY, ESQ.

13 IT IS SO ORDERED:

14 Dated: February 1, 2011.

/s/ John A. Mendez  
HONORABLE JUDGE JOHN A. MENDEZ

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1 **PROOF OF SERVICE**

2 I am employed for The O'Mara Law Firm, P.C. I am over the age of 18 and not a party  
3 to the within action; my business address is 311 East Liberty Street, Reno, Nevada 89501.

4 On January 31, 2011, I served the foregoing documents described as *Stipulation to*  
5 *Continue Deadline to File Responsive Pleadings* on all parties in this action by placing a true  
6 copy thereof enclosed in sealed envelopes addressed as follows:

7 Patrick Lee Enright 8 City of South Lake Tahoe 9 P.O. Box 28400 10 City Attorney's Office 11 1901 Airport Road, Suite 300 12 South Lake Tahoe, California 96150 13 Facsimile: (530) 542-7416 14 <i>Attorney for City of South Lake Tahoe; City of</i> 15 <i>South Lake Tahoe Police Department; and</i> 16 <i>Terry Daniels</i>	Catherine A. Woodbridge Guess Attorney General's Office of the State of California Department of Justice 1300 I Street, Suite 125 Sacramento, California 94244-2550 Facsimile: (916) 322-8288 <i>Attorney for the State of California and</i> <i>California Highway Patrol</i>
Andrew T. Caulfield, Esq. Caulfield, Davies & Donahue P.O. Box 277010 Sacramento, California 95827 Facsimile: (916) 817-2644 <i>Attorney for the County of El Dorado</i>	

17 I am readily familiar with the City's practice of collection and processing correspondence  
18 for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same  
19 day with postage thereon fully prepaid at Reno, Nevada in the ordinary course of business. I am  
20 aware that on motion of the party served, service is presumed invalid if postal cancellation date  
21 or postage meter date is more than one day after date of deposit for mailing in affidavit.  
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23 Executed on January 31, 2011, at Reno, Nevada.

24  
25  
26 /s/ Adrian M. Weis

27 \_\_\_\_\_  
28 Adrian M. Weis  
Legal Assistant to  
The O'Mara Law Firm, P.C.