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6 **Attorneys for Defendants**
 7 **County of El Dorado and**
 8 **El Dorado County Sheriff's Office**
 9 **(sued herein as El Dorado County**
 10 **Sheriff's Department)**

9 UNITED STATES DISTRICT COURT
 10 EASTERN DISTRICT OF CALIFORNIA

11 **-o0o-**

12 Simmone Graham
 13 aka Simmone Adelyn Coraham,

14 Plaintiff,

15 v.

16 City of South Lake Tahoe, et al.,

17 Defendants.

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

**STIPULATION AND PROPOSED ORDER
 RE MODIFICATION OF ORDER
 REQUIRING JOINT STATUS REPORT**

Date: March 9, 2011
Time: 9:30 a.m.
Courtroom: 6

Judge John A. Mendez

21 Plaintiff SIMMONE GRAHAM aka SIMMONE ADELYN CORAHAM ("Plaintiff"), by
 22 and through her undersigned counsel, and Defendants County of El Dorado, City of South Lake
 23 Tahoe, City of South Lake Tahoe Police Department, Terry Daniels, California Highway Patrol, Sgt.
 24 Sherry, Officer Martain and Officer Lopez (collectively, "Defendants"), by and through their
 25 undersigned counsel, hereby stipulate to the following:

26 1. **WHEREAS**, Defendants have filed motions to dismiss Plaintiff's Complaint. The
 27 hearing on the motions is currently set for March 9, 2011, at 9:30 a.m., Courtroom 6, before Judge
 28 John A. Mendez.

1 2. **WHEREAS**, Paragraph 4 of the Court's Order Requiring Joint Status Report
2 ("Order"), dated August 30, 2010, requires that the parties confer as required by Fed. R. Civ. P. 26(f)
3 and prepare and submit to the court a joint status report that includes the Rule 26(f) discovery plan
4 within sixty (60) days of service of the complaint on any party.

5 3. **WHEREAS**, based on service of the Complaint, the deadline identified in Paragraph
6 4 of the Order is February 25 2011.

7 4. **WHEREAS**, the parties collectively desire to extend the time within which they are
8 obligated to meet and confer and submit a joint status report under Paragraph 4 of the Order to
9 March 31, 2011.

10 5. **WHEREAS**, the parties respectfully request that the Court modify its Order and
11 grant an extension of time for the parties to meet and confer and submit a joint status report under
12 Paragraph 4 of the Order from February 25, 2011 to March 31, 2011.

13 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:**

14 1. The time in which the parties must meet and confer and submit a joint status report
15 under Paragraph 4 of the Order is extended from February 25, 2011 to March 31, 2011.

16 **IT IS SO STIPULATED.**

17
18 Dated: February 25, 2011

CAULFIELD DAVIES & DONAHUE, LLP

19
20 By: /s/ Andrew T. Caulfield

21 Richard H. Caulfield
22 Andrew T. Caulfield
23 Attorneys for Defendant CITY OF ISLETON
24 P.O. Box 277010
25 Sacramento, CA 95827
26 (916) 817-2900

27 [SIGNATURES CONTINUE ON FOLLOWING PAGE]
28

1 Dated: February 25, 2011

O'MARA LAW FIRM

2
3 By: /s/ William M. O'Mara
(As authorized on 2/24/2011)

4 William M. O'Mara
5 Attorney for Plaintiff Simone Graham
6 311 East Liberty Street
7 Reno, NV 89501
(775) 323-1321

8 Dated: February 25, 2011

CITY OF SOUTH LAKE TAHOE

9
10 By: /s/ Nira Feeley
(As authorized on 2/24/2011)

11 Nira Feeley
12 Attorney Defendants City of South Lake Tahoe,
13 City of South Lake Tahoe Police Department
14 and Terry Daniels
15 1901 Airport Road, Suite 300
South Lake Tahoe, CA 96150
(530) 542-6040

16 Dated: February 25, 2011

OFFICE OF THE ATTORNEY GENERAL

17
18 By: /s/ Catherine Woodbridge Guess
(As authorized on 2/24/2011)

19 Catherine Woodbridge Guess
20 Attorney for Defendants California Highway
Patrol, Sgt. Sherry, Officer Martain and Officer
21 Lopez
22 1300 I Street, Suite 125
P.O. Box 944255
23 Sacramento, CA 94244-2550
(916) 445-8216

24 **IT IS SO ORDERED.**
25 **DATED: 2/25/2011**

26 /s/ John A. Mendez

27 **THE HONORABLE JOHN A. MENDEZ**
28 **UNITED STATES DISTRICT JUDGE**