

**P O R T E R | S C O T T**

A PROFESSIONAL CORPORATION

Nancy J. Sheehan, SBN 109419

Kristina M. Hall, SBN 196794

350 University Avenue, Suite 200

Sacramento, California 95825

Telephone: (916) 929-1481

Facsimile: (916) 927-3706

E-mails: [nsheehan@porterscott.com](mailto:nsheehan@porterscott.com), [khall@porterscott.com](mailto:khall@porterscott.com)

**Attorneys for Defendants:** SHERIFF JOHN D’AGOSTINI and UNDERSHERIFF RICH WILLIAMS

**FOSTER EMPLOYMENT LAW**

Christine Maloney

3000 Lakeshore Avenue

Oakland, CA 94610

Telephone: (510) 763-1900

Facsimile: (510) 763-5952

E-mail: [cmaloney@fosteremploymentlaw.com](mailto:cmaloney@fosteremploymentlaw.com)

**Attorneys for Defendant:** EL DORADO COUNTY

**LAW OFFICES OF JILL P. TELFER**

Jill P. Telfer, SBN 145450

331 J Street, Suite 200

Sacramento, CA 95814

Telephone: (916) 446-1916

Facsimile: (916) 446-1726

E-mail: [jtelfer@telferlaw.com](mailto:jtelfer@telferlaw.com)

**Attorney for Plaintiff:** RICHARD FITZGERALD

**UNITED STATES DISTRICT COURT**

**FOR THE EASTERN DISTRICT OF CALIFORNIA**

RICHARD FITZGERALD,

CASE NO. 2:12-cv-02932-MCE-KJN

Plaintiff,

**JOINT STIPULATION AND ORDER TO ENLARGE TIME FOR FILING OF RESPONSIVE PLEADING TO FIRST AMENDED COMPLAINT**

vs.

EL DORADO COUNTY, SHERIFF JOHN D’AGOSTINI, UNDERSHERIFF RICH WILLIAMS and Does 1 through 20, inclusive,

Defendants.

Complaint Filed: November 4, 2012

First Amended Complaint Filed: February 4, 2013

THE PARTIES HEREBY STIPULATE AND AGREE that the time within which

1 Defendants D'AGOSTINI and WILLIAMS must file a response to Plaintiff's First Amended  
2 Complaint be extended from February 19, 2013, up to and including a new deadline of  
3 March 4, 2013. Defendants COUNTY, D'AGOSTINI and WILLIAMS have obtained one  
4 prior extension of time within which to file a response to Plaintiff's original Complaint.  
5 Plaintiff RICHARD FITZGERALD has obtained one prior extension of time within which to  
6 file an Amended Complaint.  
7  
8

9 Respectfully submitted,

10 Dated: February 12, 2013

**LAW OFFICES OF JILL P. TELFER**

11 By: /s/ Jill P. Telfer

12 Jill P. Telfer

13 Attorney for Plaintiff

14 RICHARD FITZGERALD

15 Dated: February 12, 2013

**PORTER SCOTT**

**A PROFESSIONAL CORPORATION**

17 By: /s/ Nancy J. Sheehan

18 Nancy J. Sheehan

19 Kristina M. Hall

20 Attorneys for Defendants

SHERIFF JOHN D'AGOSTINI and

21 UNDERSHERIFF RICH WILLIAMS

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28


Dated: February 12, 2013

**FOSTER EMPLOYMENT LAW**

By: /s/ Christine Maloney  
Christine Maloney  
Attorney for Defendant  
EL DORADO COUNTY

**IT IS SO ORDERED.**

Dated: February 15, 2013

  
\_\_\_\_\_  
MORRISON C. ENGLAND, JR., CHIEF JUDGE  
UNITED STATES DISTRICT JUDGE