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 SHERIFF'S DEPARTMENT

16 UNITED STATES DISTRICT COURT  
 17 EASTERN DISTRICT OF CALIFORNIA

18 EVERETT JEWETT,  
 19 Plaintiffs,  
 20 v.

21 SHASTA COUNTY SHERIFF'S  
 DEPARTMENT, A PUBLIC ENTITY; Dr.  
 22 JEREMY AUSTIN, an individual; MARY  
 23 BARNES, an individual; JAMES  
 ROEMECH, an individual; Tom Bosenko,  
 24 as Sheriff of the Shasta County, and  
 SHASTA COUNTY, a public entity; and  
 25 CALIFORNIA FORENSIC MEDICAL  
 GROUP, INC. a private entity,

26 Defendants.

Case No. 2:13-cv-0882 MCE AC (PC)

**STIPULATION AND ORDER RE  
 MOTION FOR AN EXTENSION TO FILE  
 PLAINTIFF'S FIFTH AMENDED  
 COMPLAINT**

Date Filed: May 16, 2013

Trial Date:

1 The parties, through their attorneys of record, stipulate and jointly request that the Court  
2 extend the deadline to either file, or seek leave to file, Plaintiff's Amended Complaint. The  
3 parties have stipulated to a 14-day extension.

4 1. The parties have previously filed, and been granted, three requests for an extension  
5 of the discovery cut-off date and dispositive motion deadline. The parties' prior requests for an  
6 extension of the discovery cut-off were granted on March 4, 2015, August 28, 2015, and March  
7 16, 2016.

8 2. This is the parties' first request for an extension of Plaintiff's deadline to file, or  
9 seek leave to file, Plaintiff's Amended Complaint. Plaintiff transmitted a copy of the Amended  
10 Complaint to Defendants on Tuesday, May 10, 2016. The Defendants requested additional time  
11 to review the Amended Complaint so that they may consider whether to stipulate to the Amended  
12 Complaint's filing. The Plaintiff believes this request to be reasonable as a stipulation would  
13 avoid additional motion practice.

14 3. The parties hereby stipulate and jointly request that the Court extend the due date  
15 for Plaintiff to file, or seek leave to file, its amended complaint by 14-days.

16 Dated: May 13, 2016

KEKER & VAN NEST LLP

17  
18 By: /s/ Steven P. Ragland  
19 STEVEN P. RAGLAND  
20 AJAY S. KRISHNAN  
21 TAYLOR GOOCH

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22 VARANINI

23  
24 Dated: May 13, 2016

25 By: /s/ Jerone Varanini  
26 JEROME MARTIN VARANINI

Attorneys for Defendants  
27 CALIFORNIA FORENSIC MEDICAL  
28 GROUP, INC., DR., JEREMY AUSTIN,  
MARY BARNES, AND JAMES  
ROEMMICH

1 Dated: May 13, 2016

BRICKWOOD LAW OFFICE

2  
3 By: /s/Gary Charles Brickwood  
4 GARY CHARLES BRICKWOOD

5 Attorneys for Defendant SHASTA  
6 COUNTY SHERIFF'S DEPARTMENT

7 I hereby attest that I have on file all holographic signatures corresponding to any  
8 signatures indicated by a conformed signature (/S/) within this e-filed document.


9  
10 **ORDER RE MOTION FOR AN EXTENSION TO FILE PLAINTIFF'S FIFTH**  
11 **AMENDED COMPLAINT**

12 On May 13, 2016, the parties, through their attorneys of record, filed a Stipulation and  
13 Joint Motion for an Extension to File Plaintiff's Fifth Amended Complaint. Good cause  
14 appearing, the motion is granted.

15 Accordingly, IT IS HEREBY ORDERED, that the deadline of May 16, 2016 to file, or  
16 seek leave to file, Plaintiff's Amended Complaint is extended to May 30, 2016.

17 IT IS SO ORDERED.

18 **Dated: May 16, 2016**

19   
20 MORRISON C. ENGLAND, JR.  
21 UNITED STATES DISTRICT JUDGE