

1 BENJAMIN B. WAGNER
United States Attorney
2 VICTORIA L. BOESCH
CHI SOO KIM
3 Assistant United States Attorneys
501 I Street, Suite 10-100
4 Sacramento, CA 95814
Telephone: (916) 554-2700
5 Facsimile: (916) 554-2900
victoria.boesch@usdoj.gov
6 chi.soo.kim@usdoj.gov

7 Attorneys for the United States

8
9 IN THE UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 I. P., A MINOR, BY AND
12 THROUGH HER GUARDIAN AD LITEM,
FACUNDO PALACIO DIAZ; MICAELA
13 PALACIO,

14 Plaintiffs,

15 v.

16 UNITED STATES OF AMERICA,

17 Defendant.

CASE NO. 2:13-CV-01012 JAM-CKD

**JOINT STIPULATION AND ORDER
REGARDING PERIODIC-PAYMENT
BRIEFING**

**JUDGE: HON. JOHN A. MENDEZ
CTRM.: 6, 14th Floor**

18
19 Defendant the United States and Plaintiffs I.P. and Micaela Palacio respectfully submit the
20 following Joint Stipulation and Proposed Order regarding the schedule for briefing about California's
21 periodic-payment statute ordered by the Court in its October 29, 2015 order. Dkt. 155 at 29. The parties
22 request that the due date for those briefs be moved from Monday November 9, 2015, to Monday
23 **November 16, 2015**. The additional week will allow time for the United States' counsel to consult with
24 Department of Justice personnel in the District of Columbia regarding the interaction of state and federal
25 law under these circumstances.
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

Respectfully submitted,

BENJAMIN B. WAGNER
United States Attorney

Dated: November 2, 2015

By: /s/ Victoria L. Boesch
VICTORIA L. BOESCH
Assistant United States Attorney

LAW OFFICE OF BRUCE G. FAGEL & ASSOCIATES

Dated: November 2, 2015

By: /s/ Bruce G. Fagel (authorized on 11/2/15)
BRUCE G. FAGEL
Attorneys for Plaintiffs

IT IS SO ORDERED.

DATED: 11/2/2015

/s/ John A. Mendez
HON. JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE