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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Estate of JOHNATHAN ROSE, deceased, by  
and through his parents THEODORE  
MILTON ROSE and KAREN ROSE, as  
successors in interest; THEODORE MILTON  
ROSE, Individually; and KAREN ROSE,  
individually.

Plaintiffs,

vs.

COUNTY OF SACRAMENTO; Sacramento  
County Sheriff SCOTT JONES; Sacramento  
County Sheriff's Department Deputy DAVID  
McENTIRE (Badge #1356); and DOES 1  
through 10, inclusive,

Defendants.

**NO. 2:13-CV-01339-TLN-EFB**

**STIPULATION AND ORDER FOR  
STAY OF ENFORCEMENT OF  
JUDGMENT AND TO SET  
DEADLINE FOR MOTION TO  
FILE ATTORNEY FEES**

1 This stipulation is to supersede and correct a typographical error contained in the  
2 Stipulation that is Docket No. 162, as well as to clarify the triggering date potentially for  
3 filing a motion for attorney fees.

4 Plaintiffs, Estate of Johnathan Rose, by and through his parents Theodore Milton  
5 Rose and Karen Rose, as successors in interest, Theodore Milton Rose, individually, and  
6 Karen Rose, individually, are represented by Stewart Katz of the Law Office of Stewart  
7 Katz, Moseley C. Collins, III of the Law Office of Moseley C. Collins, III and Dale K.  
8 Galipo of the Law Office of Dale K. Galipo. Defendants County of Sacramento and David  
9 McEntire (“Defendants”) are represented by Van Longyear of Longyear, O’Dea & Lavra,  
10 LLP.

11 The parties, through their respective attorneys, stipulate to a stay of enforcement of  
12 judgment, without the posting of a bond, through the resolution of any and all post-trial  
13 motions. The parties do not intend the stipulation to include any time period for any appeal  
14 of the judgment.

15 The parties further stipulate that any motion for attorney fees shall be due 28 days  
16 from the Court’s order deciding Docket No. 166, which is Defendants’ Notice of Motion  
17 and Motion for Order Altering/Amending the Judgment to Strike the Award of  
18 Noneconomic Damages to Plaintiff Theodore Rose, Jr. and/or for Judgment as a Matter of  
19 Law and/or in the Alternative an Order for a New Trial.

20  
21 Dated: April 23, 2018

LAW OFFICE OF STEWART KATZ

22 /s/ Stewart Katz  
23 STEWART KATZ  
24 Attorney for Plaintiffs

25 Dated: April 23, 2018

LONGYEAR, O’DEA & LAVRA, LLP

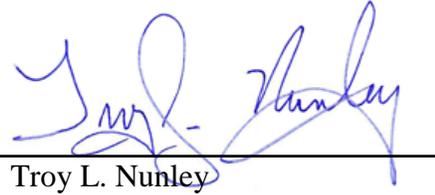
26 /s/ Van Longyear  
27 VAN LONGYEAR  
28 Attorneys for Defendants

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**ORDER**

**IT IS SO ORDERED.**

Dated: April 24, 2018



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Troy L. Nunley  
United States District Judge