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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.

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

**STIPULATION AND ORDER
EXTENDING THE DEADLINE TO
FILE A MOTION FOR
ATTORNEY FEES**

Plaintiffs,

vs.

COUNTY OF SACRAMENTO and
Sacramento County Sheriff's Department
Deputy DAVID McENTIRE (Badge #1356),

Defendants.

///

1 This Stipulation and Proposed Order is to supersede the Stipulation and Order that is
2 Docket No. 189 regarding the date by which a motion for attorney fees must be filed.

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

10 The parties stipulate that any motion for attorney fees shall be filed on or before
11 October 3, 2018.

12 The purpose of this stipulation is to facilitate the continuing discussions between
13 the parties regarding the resolution of all issues in this case, notwithstanding the notices of
14 appeal which have been filed. The parties believe that this stipulation increases the
15 likelihood of a negotiated resolution being reached.

16
17 Dated: September 10, 2018

LAW OFFICE OF STEWART KATZ

18 /s/ Stewart Katz
19 STEWART KATZ
Attorney for Plaintiffs

20
21 Dated: September 10, 2018

HORVITZ & LEVY LLP

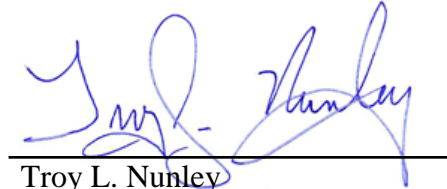
22 /s/ Daniel Gonzalez
23 DANIEL J. GONZALEZ
24 Attorneys for Defendants
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ORDER

IT IS SO ORDERED.

Dated: September 13, 2018



Troy L. Nunley
United States District Judge