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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. 196 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 31, 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 have made some progress towards resolution but
15 it has been a slow process. The parties believe that this stipulation increases the likelihood
16 of a negotiated resolution being reached.

17
18 Dated: September 24, 2018 LAW OFFICE OF STEWART KATZ
19 /s/ Stewart Katz
20 STEWART KATZ
21 Attorney for Plaintiffs

22 Dated: September 24, 2018 LONGYEAR, O’DEA & LAVRA, LLP
23 /s/ Van Longyear
24 VAN LONGYEAR
25 Attorneys for Defendants

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ORDER

IT IS SO ORDERED.

Dated: September 26, 2018



Troy L. Nunley
United States District Judge