

1 KAMALA D. HARRIS, State Bar No. 146672
 Attorney General of California
 2 ISMAEL A. CASTRO, State Bar No. 85452
 Supervising Deputy Attorney General
 3 RENU R. GEORGE, State Bar No. 262310
 Deputy Attorney General
 4 1300 I Street, Suite 125
 P.O. Box 944255
 5 Sacramento, CA 94244-2550
 Telephone: (916) 445-8220
 6 Fax: (916) 324-5567
 E-mail: Renuka.George@doj.ca.gov
 7 *Attorneys for Defendants Community Care*
Licensing, Michelle Wong, Leon "Geoff" Wells in
 8 *their official capacity*

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

14 **ROBIN MAMMEN, LARRY MAMMEN**
 15 **Individually and as Guardian Ad Litem for**
 16 **A.P.,**

16 Plaintiffs,

17 v.

18 **COUNTY OF SACRAMENTO,**
 19 **DEPARTMENT OF HEALTH AND**
 20 **HUMAN SERVICES; ANNE EDWARDS;**
 21 **MICHELLE CALLEJAS; LUIS VILLA;**
 22 **STEPHANIE LYNCH; DEBBIE**
 23 **WILLIAMS; CRAIG LARKEN; RENAE**
 24 **RODOCKER; MIRI MEE; JACK**
 25 **DANIEL; JEANINE LOPEZ; REY**
 26 **CARBONI; COMMUNITY CARE**
 27 **LICENSING; MICHELLE WONG;**
 28 **GEOFF WELLS; BRENDA CHANEY;**
CHILDREN'S LAW CENTER; DANA
PETERS; AND DOES 1-100, INCLUSIVE

Defendants.

2:13-cv-01588 JAM-AC

**JOINT STIPULATION EXTENDING
 TIME FOR STATE DEFENDANTS TO
 RESPOND TO FIRST AMENDED
 COMPLAINT AND ORDER THEREON
 [Local Rule 144(a)]**

Judge: John A. Mendez
 Trial Date: None Set
 Complaint Filed: August 1, 2013

1 **JOINT STIPULATION EXTENDING TIME FOR STATE DEFENDANTS TO**
2 **RESPOND TO FIRST AMENDED COMPLAINT**

3 Pursuant to Local Rule 144(a), Plaintiffs Robin Mammen, et. al., and Defendants
4 Community Care Licensing, Michelle Wong, and Leon “Geoff” Wells in their official capacity
5 (collectively “State Defendants”), by and through their respective counsel, hereby stipulate to
6 grant State Defendants additional time to respond to Plaintiffs’ First Amended Complaint as set
7 forth below:

8 WHEREAS, Plaintiffs filed a Complaint on August 1, 2013 and a First Amended
9 Complaint on November 18, 2013 naming Community Care Licensing, Michelle Wong, and Leon
10 “Geoff” Wells as Defendants in this action;

11 WHEREAS, on November 21, 2013, Plaintiffs served Defendant Community Care
12 Licensing with the Summons and First Amended Complaint;

13 WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), Defendant
14 Community Care Licensing’s response to Plaintiffs’ First Amended Complaint is due December
15 12, 2013;

16 WHEREAS, State Defendants require additional time in which to respond to Plaintiffs’
17 First Amended Complaint;

18 WHEREAS, this extension is sought so that State Defendants may enhance efficiency and
19 respond to Plaintiffs’ First Amended Complaint on behalf of Community Care Licensing as well
20 as the remaining State Defendants not yet served;

21 WHEREAS, in the interest of justice and in an effort to enhance judicial efficiency and
22 preserve resources, the Plaintiffs agree to grant State Defendants additional time in which to
23 respond to the Complaint;

24 WHEREAS, the extension sought will not alter the date of any event or deadline already
25 fixed by Court Order.

26 NOW THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE that the time
27 in which State Defendants shall respond to the Complaint in this action shall be continued until
28 January 9, 2014.

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,

KAMALA D. HARRIS
Attorney General of California
ISMAEL A. CASTRO
Supervising Deputy Attorney General

Dated: December 6, 2013

/s/ Renu R. George
RENU R. GEORGE
Deputy Attorney General
*Attorneys for Defendants Community Care
Licensing, Michelle Wong, Leon "Geoff" Wells,
in their official capacity*

Dated: December 6, 2013

/s/ Dennise Henderson
DENNISE SUZANNE HENDERSON
Law Office of Dennise Henderson
Attorneys for Plaintiffs Robin Mammen, et. al.

ORDER THEREON

Based on the Parties' above Joint Stipulation, IT IS HEREBY SO ORDERED THAT the Defendants' time to serve and file a response to Plaintiffs' First Amended Complaint in the above entitled action be extended from December 21, 2013 to January 9, 2014 pursuant to Local Rule 144(a).

DATE: 12/11/2013

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