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6 *Attorneys for R.Mammen, L. Mammen and A.P.*

8 **BEFORE THE UNITED STATES DISTRICT COURT**
 9 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

10 ROBIN MAMMEN, LARRY MAMMEN)
 11 Individually and as Guardian Ad Litem for A.P.)

12 Plaintiffs,

14 v.

15 COUNTY OF SACRAMENTO,
 16 DEPARTMENT OF HEALTH AND
 HUMAN SERVICES; ANNE EDWARDS;
 17 MICHELLE CALLEJAS; LUIS VILLA;
 STEPHANIE LYNCH; DEBBIE WILIAMS;
 18 CRAIG LARKEN; RENAE
 RODOCKER; MIRI MEE; JACK DANIEL;
 19 JEANINE LOPEZ; REY CARBONI;
 COMMUNITY CARE LICENSING;
 20 MICHELLE WONG; GEOFF WELLS;
 21 BRENDA CHANEY; CHILDRENS LAW
 CENTER; DANA PETERS; AND DOES 1
 22 through 20, Inclusive
 Defendants

) **Case No. 2:13-CV-01588-JAM-AC**
)
) **JOINT STIPULATION FOR**
) **CONTINUANCE TO ALLOW**
) **PLAINTIFF TO FILE AN AMENDED**
) **COMPLAINT AND DEFENDANTS**
) **TO WITHDRAW CURRENT**
) **MOTIONS TO DISMISS**

23 Plaintiffs ROBIN MAMMEN, LARRY MAMMEN AND A.P. ("Plaintiffs") and
 24 Defendants COUNTY OF SACRAMENTO, DEPARTMENT OF HEALTH AND HUMAN
 25 SERVICES: ANN EDWARDS: MICHELLE CALLEJAS; LUIS VILLA; STEPHANIE LYNCH;
 26 DEBRA WILLIAMS; CRAIG LARKIN; RENAE RODOCKER; MIRI MEE; JEANNINE
 27 LOPEZ; REY CARBONI; COMMUNITY CARE LICENSING; MICHELLE WONG; GEOFF

1 WELLS; BRENDA CHANEY; CHILDRENS LAW CENTER; DANA PETERS AND DOES 1-
2 100, INCLUSIVE. ("Defendants") (hereafter collectively referred to as "the Parties") submit this
3 stipulation to request a continuance in this matter as follows:

4 WHEREAS, Plaintiffs filed a complaint against all Defendants on August 1, 2013 [Docket1];

5 WHEREAS, County Defendants filed a Motion to Dismiss on October 22, 2013 [Docket 14];

6 WHEREAS, Plaintiffs filed a First Amended Complaint against all Defendants on November
7 18, 2013 [Docket 16];

8 WHEREAS; State Defendants filed for an extension of time on December 6, 2013 [Docket 25];

9 WHEREAS, the Court signed an Order granting County Defendant's request for an extension
10 of time. [Docket 24];

11 WHEREAS, County Defendants filed a Motion to Dismiss on December 23, 2013 [Docket 27];

12 WHEREAS, State Defendants filed a Motion to Dismiss on January 9, 2014 [Docket 28];

13 WHEREAS, Plaintiffs secured new counsel and submitted a substitution of attorney notice on
14 or about February 1, 2014;

15 WHEREAS, the Parties conferred by phone February 3, 2014 and agreed to stipulate to a
16 continuance to permit Plaintiffs to file an amended complaint without waiving Defendants'
17 right to file a motion to dismiss or to file a response;

18 The Parties stipulate as follows:

- 19 1. Plaintiff will be permitted to file an amended complaint ("Second Amended Complaint) by
20 March 14, 2014;
- 21 2. Without waiving their right to file responsive pleadings pursuant to Fed. R. Civ. Proc. 12
22 or to Answer the Complaint, the Defendants will withdraw their presently filed Motions to
23 Dismiss;
- 24 3. The Parties will file a Joint Case Management Conference Statement 60 days after the date
25 of the filing of the amended complaint and shall confer regarding this Conference
26 Statement pursuant to Judge Mendez's Order regarding filing requirements.

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THE PARTIES SO STIPULATE.

Dated this 4th day of February, 2014.

Respectfully submitted,
LEIGH LAW GROUP

By: /s Mandy G. Leigh
Mandy G. Leigh
Attorneys for Plaintiffs

Dated this 4th day of February, 2014.

Respectfully submitted,

CALIFORNIA DEPT OF JUSTICE

By: /s Renuka R. George

Renuka R. George
*Attorneys for Community Care Licensing;
Michelle Wong, Leon "Geoff" Wells and
Brenda Chaney ("State Defendants")*

Dated this 4th day of February, 2014.

Respectfully submitted,

LONGYEAR, O'DEA & LAVRA, LLP

By: /s Amanda L. McDermott
Amanda L. McDermott
*Attorneys for County of Sacramento
and the individually named County
Defendants*

