

1 Jay T. Jambeck SBN #226018
 2 Mandy G. Leigh SBN # 225748
 3 LEIGH LAW GROUP
 4 870 Market Street, Suite 1157
 5 San Francisco, CA 94102
 6 Telephone: 415-399-9155
 7 Facsimile: 415-795-3733
 8 Email: mleigh@leighlawgroup.com

6 *Attorneys for Plaintiffs*
 7 A.P. (a minor); Robin Mammen
 8 and Larry Mammen individually
 9 and as Guardian Ad Litem

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

<p>13 A.P. (a minor); ROBIN MAMMEN and 14 LARRY MAMMEN individually and as 15 Guardian Ad Litem for A.P.,</p> <p style="text-align: right;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>17 COMMUNITY CARE LICENSING, 18 MICHELLE WONG; CHILDREN’S LAW 19 CENTER; COUNTY OF SACRAMENTO, 20 STEPHANIE LYNCH, LUIS VILLA; 21 MICHELLE CALLEJAS, DEBRA 22 WILLIAMS, CRAIG LARKIN, RENAE 23 RODOCKER</p> <p style="text-align: right;">Defendants.</p>
--

2:13-cv-01588 JAM-AC

**JOINT STIPULATION SETTING TIME
 FOR FILING OF PLAINTIFFS’ THIRD
 AMENDED COMPLAINT AND
 EXTENDING TIME FOR JOINT CASE
 MANAGEMENT CONFERENCE
 STATEMENT**

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

**JOINT STIPULATION SETTING TIME FOR THE FILING OF PLAINTIFFS’ THIRD
 AMENDED COMPLAINT AND EXTENDING TIME FOR CASE MANAGEMENT
 CONFERENCE**

Pursuant to Local Rule 144(a), Plaintiffs Robin Mammen, et. al., Defendants Community Care Licensing and Michelle Wong in her official capacity (collectively “State Defendants”), and County of Sacramento, Stephanie Lynch, Michelle Callejas, Debra Williams, Renae Rodocker,

1 Luis Villa and Craig Larkin (collectively “County Defendants”) by and through their respective
2 counsel, hereby stipulate to a date for the filing of Plaintiffs’ Third Amended Complaint and to
3 postpone the submission of their Joint Case Management Conference Statement as set forth
4 below:

5 WHEREAS, on June 9, 2014 the Court granted the Motion to Dismiss the Second Amended
6 Complaint of Defendants Community Care Licensing and Michelle Wong in her official capacity
7 (collectively “State Defendants”) with leave to amend certain portions of the complaint;

8 WHEREAS, no specific date was set forth in the Court’s order for the filing of Plaintiffs’
9 Third Amended Complaint;

10 WHEREAS, the parties have agreed to a deadline of 21 days from the issuance of the
11 Court’s June 9, 2014 Order for Plaintiffs to file their Third Amended Complaint;

12 WHEREAS, this extension is sought so that the parties may enhance efficiency and meet
13 and confer as to the submission of the Joint Case Management Conference Statement pending the
14 resolution of motions directed at the Third Amended Complaint or the filing of an Answer;

15 WHEREAS, in the interest of justice and in an effort to enhance judicial efficiency and
16 preserve resources, the parties agree to postpone the submission of the Joint Case Management
17 Statement until thirty (30) days after any motion directed at the Third Amended Complaint is
18 ruled upon, or if no motion is filed, within thirty (30) days of the filing of an Answer by the State
19 Defendants;

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

22 NOW THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE that the
23 Plaintiff’s Third Amended Complaint shall be filed on or before June 30, 2014 and that
24 submission of the Joint Case Management Statement shall be postponed until thirty (30) days
25 after the Court rules on a motion directed at the Third Amended Complaint, or if no motion is
26 filed, thirty (30) days after the State Defendants file an Answer to the Third Amended Complaint.

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,

LEIGH LAW GROUP

Dated: June 13, 2014

/s/ Jay T. Jambeck
JAY T. JAMBECK
Leigh Law Group
Attorneys for Plaintiffs Robin Mammen, et. al.

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

Dated: June 13, 2014

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

LONGYEAR, O'DAY & LAVRA, LLP

Dated: June 13, 2014

/s/ Amanda L. McDermott
AMANDA L. MCDERMOTT
Attorneys for County Defendants

IT IS SO ORDRED

Dated: 6/17/2014

/s/ John A. Mendez
Hon. John A. Mendez
UNITED STATES DISTRICT COURT JUDGE