

PLACER COUNTY COUNSEL'S OFFICE
Crystal M. Center (SBN 287845)
175 Fulweiler Avenue
Auburn, California 95603
Telephone: (530) 889-4044
Facsimile: (530) 889-4069

Attorneys for Defendants COUNTY OF PLACER, PLACER COUNTY
DEPARTMENT OF HEALTH AND HUMAN SERVICES, RICHARD J.
BURTON, KEVIN HENDERSON, DIANA RYAN, H. PAUL SANDERS,
APRIL CAREW, KATHY TANNER, KAREN SCHLANGER, TOM LIND,
CANDYCE SKINNER, and ROMNEY LYNN

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Stacey Victoria Hartnett,

Plaintiff,

vs.

COUNTY OF PLACER, a public entity;
PLACER COUNTY DEPARTMENT OF
HEALTH AND HUMAN SERVICES (CSOC),
a public entity, PLACER COUNTY COURT
APPOINTED SPECIAL ADVOCATES
(CASA), a public entity, RICHARD J.
BURTON, M.D., M.P.H., DIRECTOR, as an
individual and in official capacity; KEVIN
HENDERSON, as an individual and in official
capacity; DIANA RYAN, Program Supervisor,
as an individual and in official capacity; H.
PAUL SANDERS, as an individual and in
official capacity; April Carew, as an individual
and in official capacity; KATHY TANNER, as
an individual and in official capacity; KAREN
SCHLANGER, as an individual and in official
capacity; TOM LIND, as an individual and in
official capacity; CANDACE SKINNER, as an
individual and in official capacity; ROMNEY
LYNN, as an individual and in official capacity;
DON KLEINDER, CASA DIRECTOR, as an

Case No. 2:13-cv-1636-GEB-KJN

**STIPULATION AND [PROPOSED]
ORDER RE EXTENSION OF TIME TO
FILE RESPONSE TO COMPLAINT**

1 individual and in official capacity; TAMARA)
2 LARSON, CASA worker as an individual and)
3 in official capacity; and Does 1 through 25,)
4 inclusive,)

5 Defendants.)
6)
7)

8 IT IS HEREBY STIPULATED between Plaintiff Stacey Victoria Hartnett and Defendants
9 Placer County, Placer County Health and Human Services (CSOC), Richard J. Burton, Kevin
10 Henderson, Diana Ryan, H. Paul Sanders, April Carew, Kathy Tanner, Karen Schlanger, Candace
11 Skinner, Tom Lind, Romney Lynn, Don Kleinder and Tamara Larson that the time for these
12 Defendants to respond to the operative complaint shall be extended to **April 30, 2015**. The time to
13 respond is being requested to allow Crystal M. Center, counsel for Placer County defendants, who
14 will be on maternity leave beginning on or before February 4, 2015 until on or about April 8, 2015,
15 adequate time to respond to Plaintiff's complaint following the decision rendered by the court on
16 Defendants' Motions to Dismiss currently set for hearing on January 20, 2015.

17 Pursuant to Local Rule 144(a), stipulations in excess of 28 days to answer or otherwise
18 respond to a complaint must be approved by the Court.

19 IT IS SO STIPULATED.

20 Dated: January 10, 2015

PLACER COUNTY COUNSEL'S OFFICE

21 By: /s/ Crystal M. Center

22 CRYSTAL CENTER
23 Attorneys for Defendants COUNTY OF
24 PLACER, PLACER COUNTY DEPARTMENT
25 OF HEALTH AND HUMAN SERVICES,
26 RICHARD J. BURTON, KEVIN
27 HENDERSON, DIANA RYAN, H. PAUL
28 SANDERS, APRIL CAREW, KATHY
TANNER, KAREN SCHLANGER, TOM
LIND, CANDYCE SKINNER, and ROMNEY
LYNN

1 Dated: By: _____
2 STROWBRIDGE BLASDEL RICHARDSON
3 Attorney for Stacey Hartnett

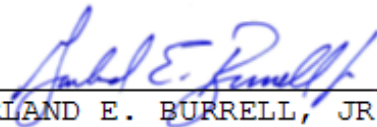
4 Dated: By: _____
5
6 Ron Enabnit
7 Attorney for DON KLEINDER, CASA and
8 TAMARA LARSON, CASA

8 **ORDER**

9 Pursuant to the parties' stipulation, the time to respond to the operative complaint is hereby
10 extended to **April 30, 2015**.

11 IT IS SO ORDERED.

12 Dated: January 16, 2015

13
14
15 
16 GARLAND E. BURRELL, JR.
17 Senior United States District Judge
18
19
20
21
22
23
24
25
26
27
28