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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

12 Stacey Victoria Hartnett,) Case No. 2:13-cv-1636-GEB-KJN
13)
14 Plaintiff,) STIPULATION AND [PROPOSED]
15 vs.) ORDER RE EXTENSION OF TIME TO
16) FILE RESPONSE TO COMPLAINT
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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)

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

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

IT IS SO STIPULATED.

Dated: January 10, 2015

PLACER COUNTY COUNSEL'S OFFICE

By: /s/ Crystal M. Center

CRYSTAL CENTER
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

1 Dated: By: _____
2
3 STROWBRIDGE BLASDEL RICHARDSON
4 Attorney for Stacey Hartnett
5

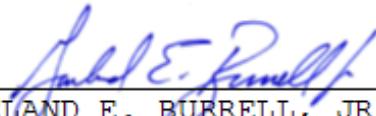
6 Dated: By: _____
7
8 Ron Enabnit
9 Attorney for DON KLEINDER, CASA and
10 TAMARA LARSON, CASA
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12 **ORDER**

13 Pursuant to the parties' stipulation, the time to respond to the operative complaint is hereby
14 extended to **April 30, 2015**.
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16 IT IS SO ORDERED.
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18 Dated: January 16, 2015
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22 GARLAND E. BURRELL, JR.
23 Senior United States District Judge
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