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17 **UNITED STATES DISTRICT COURT**

18 **EASTERN DISTRICT OF CALIFORNIA SACRAMENTO DIVISION**

19 **LINDSEY SHAMBERGER, as an**  
20 **individual and on behalf of her minor son,**  
21 **EC,**

22 **Plaintiff,**

23 **vs.**

24 **DANA TELLO and COUNTY OF YOLO,**

25 **Defendant**

26 **) Case No.: 2:14-cv-00243-WBS-DAD**

27 **) STIPULATION AND [PROPOSED]**  
28 **) ORDER TO CONTINUE HEARING ON**  
**) DEFENDANT’S MOTION FOR**  
**) SUMMARY JUDGMENT, OR IN THE**  
**) ALTERNATIVE SUMMARY**  
**) ADJUDICATION**

29 COMES NOW THE PARTIES by and through their respective counsel and subject to  
30 the approval of this Court, hereby stipulate and respectfully request that this Court continue the  
31 hearing date on Defendant Tello’s Motion for Summary Judgment, or in the alternative,  
32 Summary Adjudication to Monday, November 28, 2016, at 1:30 p.m.

33 WHEREAS, pursuant to stipulation of the parties, on October 27, 2016, the Court  
34 ordered that the complaint and claims of Plaintiff Lindsey Shamberger against Defendants Dana  
35 Tello and County of Yolo are dismissed with prejudice [ECF No. 27];

1           WHEREAS, additional time is required to effectuate the dismissal and/or compromise  
2 of the claims of Plaintiff E.C., a minor;

3           WHEREAS, continuing the hearing date will not prejudice any party or their counsel;

4           WHEREAS, this request is not being made for the purpose of delay, or any other  
5 improper purpose; and

6           THEREFORE, IT IS HEREBY STIPULATED and agreed by and between the parties  
7 that this Court continue the hearing on Defendant's Motion for Summary Judgment, or in the  
8 alternative, Summary Adjudication as set forth above.

9 IT IS SO STIPULATED.

11 Dated: 10/27/2016

LONGYEAR, O'DEA & LAVRA, LLP


12  
13 By: /s/ John A. Lavra  
14 JOHN A. LAVRA,  
Attorney for County of Yolo and Dana Tello

15 Dated: 10/27/2016

16 By: /s/ Harry D. Roth  
17 HARRY D. ROTH  
18 Attorney for Plaintiffs  
Lindsey Shamberger and Minor Son

19 IT IS SO ORDERED.

20 Dated: October 28, 2016

21   
22 WILLIAM B. SHUBB  
23 UNITED STATES DISTRICT JUDGE  
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