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20 **UNITED STATES DISTRICT COURT**

21 **EASTERN DISTRICT OF CALIFORNIA**

22 B.O.L.T. an unincorporated association of
23 motorcycle riders and enthusiasts; MARK
24 TEMPLE; JOHN DALKE; LAWRENCE
25 "WOLF" HAVEN; NOREEN McNULTY;
26 WARREN PEARL; LYLE
27 DUVAUCHELLE; JEFFREY RABE;
28 DAVID ZALITSKIY; WILLIAM
LANGHORNE; THOMAS BELL; ROBERT
BALTHORPE II;

Plaintiffs,

vs.

CITY OF RANCHO CORDOVA, a political
subdivision of the State of California;
COUNTY OF SACRAMENTO; a political
subdivision of the State of California;
RANCHO CORDOVA POLICE
DEPARTMENT, an independent legal agency
of the COUNTY OF SACRAMENTO and the

Case No. 2:14-cv-01588-GEB-DAD

**STIPULATION AND [PROPOSED] TO
EXTEND TIME FOR DEFENDANTS TO
FILE A RESPONSIVE PLEADING, FOR
PLAINTIFFS TO FILE A SECOND
AMENDED COMPLAINT, AND FOR
SERVICE OF SAME**

Complaint filed July 4, 2014

1 CITY OF RANCHO CORDOVA;
2 SACRAMENTO COUNTY SHERIFF'S
3 DEPARTMENT; MICHAEL GOOLD, in his
4 official capacity as the Chief of Police of the
5 CITY OF RANCHO CORDOVA; RANCHO
6 CORDOVA POLICE TRAFFIC SERGEANT
7 G. LANE, in his individual and official
8 capacity as Supervisor of the Traffic Division;
9 SCOTT R. JONES, in his official capacity as
10 the SHERIFF of the COUNTY OF
11 SACRAMENTO; RANCHO CORDOVA
12 POLICE OFFICER S. CARROZZO (badge
13 number 480); RANCHO CORDOVA
14 POLICE OFFICER M. JAMES (badge
15 number 507); RANCHO CORDOVA POLICE
16 OFFICER S. PADGETT (badge number
17 1174),

18
19 Defendants.

20 /

21
22 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs and Defendants,
23 by and through their undersigned Counsel, pursuant to Eastern District Local Rule 143 and 144 as
24 follows:

- 25 1) The parties have met and conferred regarding deficiencies and ambiguities in the
26 First Amended Complaint filed.
- 27 2) In the interest of expediting this matter, the parties agree that a Second Amended
28 Complaint would expedite the law and motion process, and resolve any technical
deficiencies.
- 3) Defendants' responsive pleading and/or motion as to the First Amended Complaint
is currently due Monday, February 2, 2015.
- 4) The parties respectfully request that the Court extend the time for Defendants to file
a responsive pleading and/or motion up to and including February 23, 2015.
- 5) The parties stipulate and further respectfully request that the Court grant Plaintiffs
leave to file a Second Amended Complaint by February 10, 2015, with a draft
emailed to Defendants on February 3, 2015, for the purposes of further meet and
confer.

6) This Stipulation may be signed in counterparts and any facsimile or electronic signature shall be as valid as an original signature.

IT IS SO STIPULATED.

Dated: February 2, 2015

Respectfully submitted,
LAW OFFICES OF GARY W. GORSKI

By /s/Gary W. Gorski
Gary W. Gorski

STRATEGIC LAW COMMAND
/c/Daniel M. Karalash
Daniel M. Karalash

Attorneys for Plaintiffs

Dated: February 2, 2015

PORTER SCOTT
A PROFESSIONAL CORPORATION

By /s/ Kristina M. Hall
Terence J. Cassidy
Kristina M. Hall
Attorneys for Defendants

CITY OF RANCHO CORDOVA, COUNTY
OF SACRAMENTO, RANCHO CORDOVA
POLICE DEPARTMENT, SACRAMENTO
COUNTY SHERIFF'S DEPARTMENT,
MICHAEL GOOLD, G. LANE, SCOTT R.
JONES, S. CARROZZO, M. JAMES, and S.
PADGETT

ORDER

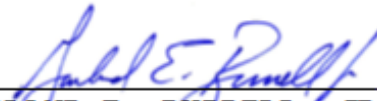
Having reviewed the above stipulation, IT IS HEREBY ORDERED that the time for Defendants to respond to the operative Complaint in this action be, and hereby is, extended to February 23, 2015;

IT IS FURTHER ORDERED, that Plaintiffs referenced Second Amended Complaint shall be filed no later than February 10, 2015.

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IT IS SO ORDERED.

Dated: February 2, 2015



GARLAND E. BURRELL, JR.
Senior United States District Judge