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Attorneys for Defendants

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

YOUSSEF BOULAALAM,

Plaintiff,

vs.

COUNTY OF MONO, CALIFORNIA;
MONO COUNTY SHERIFF'S SERGEANT
RICHARD HAHN; MONO COUNTY
SHERIFF'S DEPUTY ARTURO TORRES; in
their individual capacities, and DOES 1-100,
Inclusive,

Defendants.

Case No.: 2:14-CV-02112 MCE EFB

**STIPULATED APPLICATION FOR ORDER
EXTENDING TIME TO RESPOND TO
COMPLAINT (LOCAL RULE 144); ORDER**

Pursuant to Local Rule 144, the parties hereto, by and through their respective undersigned counsel, hereby stipulate and agree to an extension of defendants' deadline to respond to the complaint, to and including March 23, 2015.

In support of this stipulation, the undersigned counsel for defendants, Marjorie E. Manning, declares as follows:

1. I am an attorney licensed to practice law in the State of California and in this Court, and am a shareholder of Bolling & Gawthrop, counsel for defendants County of Mono, Richard Hahn and Arturo Torres in this action.

1 2. This action was filed on September 12, 2014. Thereafter, I agreed with plaintiff's counsel
2 to accept service on behalf of the defendants, and the parties entered into a stipulation filed January 22,
3 2015, which provided that defendants' deadline to respond to the complaint was March 2, 2015.

4 3. When I entered into the initial stipulation with plaintiff's counsel, I anticipated there would
5 be adequate time to respond to the complaint on my clients' behalf. Since then, however, a number of
6 unforeseen events have transpired. The four primary matters which have demanded my attention in the
7 interim include (1) a hotly contested legal malpractice case originally filed in bankruptcy court and now
8 on appeal to the United States District Court, in which multiple post-judgment motions have been filed
9 and the court has just ordered another round of briefing; (2) a complicated probate matter that settled
10 without litigation, but with settlement terms that have required the parties to go back to the drawing board
11 repeatedly with modifications of the agreement due to complicated tax and securities issues; (3) a
12 complicated and multi-faceted case involving complicated employment, labor law, civil rights and
13 workers compensation issues; and (4) case involving severe injuries allegedly sustained as a result of the
14 dangerous condition of property which has necessitated many hours of research and negotiations
15 concerning contested insurance coverage issues.

16 4. The complaint in the present action is 58 pages long, alleges 9 causes of action, and
17 includes sections devoted to argument. Punitive damages are sought against the individual defendants. I
18 need additional time to analyze the pleading and confer with my clients prior to determining the
19 appropriate response to what is an unusually lengthy and complicated pleading. In addition, plaintiff's
20 counsel has raised the issue of potential alternative dispute resolution in this matter and it is necessary that
21 I explore that possibility with my clients.

22 5. There has been only one previous extension of time to respond to the complaint in this
23 matter, namely, that stipulated to initially in exchange for my agreement to accept service on behalf of my
24 clients. The present extension would extend the deadline to respond to the complaint by only 21
25 additional days, i.e., until March 23, 2015.

26 6. There are no other deadlines in this case that would be affected by the proposed extension.
27
28

1 7. Plaintiff's counsel's consent to the requested extension is reflected in the stipulation set
2 forth below.

3 I hereby declare under penalty of perjury pursuant to the laws of the United States and the State of
4 California that the foregoing is true and correct, that I have personal knowledge of the facts set forth
5 herein, and if called as a witness in this matter I am competent to testify thereto.

6 Executed this 25th day of February 2015 at Sacramento, California.

7 /s/ Marjorie. E. Manning
8 Marjorie E. Manning

9 **STIPULATION**

10 The parties hereto, by and through their attorneys of record, hereby stipulate as follows:

11 1. The complaint in this matter was filed September 12, 2014.

12 2. By stipulation filed January 22, 2015, counsel for the Defendants agreed to accept service
13 on her clients' behalf and Defendants were allowed until March 2, 2015, to respond to the complaint.

14 3. Due to a press of business upon Defense counsel, coupled with the parties' consideration of
15 Voluntary Dispute Resolution under Local Rule 271, the parties agree that Defendants shall have an
16 additional 21 days, until March 23, 2015, to respond to the complaint.

17 Date: February 25, 2015

Law Office of Allen Berrey

18 By: /s/ Allen Berrey
19 Allen Berrey

20 Date: February 25, 2015

Jesse Ortiz Law

21 By: /s/ Ben Williams
22 Ben Williams
23 Attorneys for Plaintiff

24 Date: February 25, 2015


Bolling & Gawthrop

25 By: /s/Marjorie E. Manning
26 Marjorie E. Manning
27 Attorneys for Defendants

ORDER

IT IS HEREBY ORDERED that Defendants shall have an extension up to and including March 23, 2015 in which to respond to the complaint.

Dated: March 3, 2015



MORRISON C. ENGLAND, JR., CHIEF JUDGE
UNITED STATES DISTRICT COURT