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7 Attorneys for Defendants COUNTY OF YOLO (also sued erroneously herein as YOLO
8 COUNTY SHERIFF'S DEPARTMENT and YOLO COUNTY PROBATION DEPARTMENT),
L. GARCIA, J. CEJA, J. LAZARO, M. NEVIS, and V. BIGELOW

9
10 **UNITED STATES DISTRICT COURT**

11 **EASTERN DISTRICT OF CALIFORNIA**

12 THERESA MARIE NIESEN,

) Case No.: 2:14-cv-02921-WBS-DAD

)

13 Plaintiff,

)

14 vs.

) **STIPULATION EXTENDING TIME FOR
15 DEFENDANT BIGELOW TO RESPOND
TO PLAINTIFF'S COMPLAINT AND
16 [PROPOSED] ORDER THEREON**

16 L. GARCIA, YOLO COUNTY SHERIFF'S
DEPUTY; J. CEJA, YOLO COUNTY

)

17 SHERIFF'S DEPUTY; J. LAZARO, YOLO
COUNTY SHERIFF'S DEPUTY; M. NEVIS,

)

18 YOLO COUNTY SHERIFF'S DEPUTY;

)

19 OFFICER BIGELOW, ANIMAL CONTROL

)

20 OFFICER FOR YOLO COUNTY; YOLO

)

21 COUNTY SHERIFF'S DEPARTMENT;

)

YOLO COUNTY PROBATION

)

22 DEPARTMENT, and Does 1 through 50, et al.,)

)

)

23 Defendants.

)

)

24 WHEREAS Defendants COUNTY OF YOLO (also sued erroneously herein as YOLO
25 COUNTY SHERIFF'S DEPARTMENT and YOLO COUNTY PROBATION DEPARTMENT),
26 L. GARCIA, J. CEJA, J. LAZARO, and M. NEVIS responded to the complaint by filing a
27 motion to dismiss, which is set to be heard on April 20, 2015.

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1 WHEREAS Defendant V. BIGELOW was served with the complaint after the other
2 Defendants and thus is not a party to the motion.

3 WHEREAS Defendant V. BIGELOW'S response date to the complaint is April 16, 2015.

4 WHEREAS Plaintiff's counsel has agreed to give Defendant BIGELOW a response time
5 to the complaint that is contemporaneous with the other Defendants and based upon the Court's
6 ruling on the motion to dismiss.

7 WHEREAS this is the parties' first request for an extension.

8 THE PARTIES THEREFORE, BY AND THROUGH THEIR RESPECTIVE
9 ATTORNEYS OF RECORD MAKE THE FOLLOWING STIPULATED REQUEST:

10 1. If the motion to dismiss is denied, Defendant BIGELOW will respond
11 concurrently with the other Defendants in the same answer within the statutory time period after
12 a denial of the motion.

13 2. If the motion to dismiss is granted, Defendant BIGELOW will respond to any
14 amended complaint simultaneously with the other Defendants.

15 IT IS SO ORDERED.

16 Dated: April 14, 2015



18 WILLIAM B. SHUBB
19 UNITED STATES DISTRICT JUDGE

20
21
22 Dated: April 10, 2015

LAW OFFICES OF JULIA M. YOUNG

25 /s/ Julia M. Young
[as authorized on 4/10/15]

26 By: _____
27 JULIA M. YOUNG
28 Attorney for Plaintiff THERESA MARIE
NIESEN

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Dated: April 14, 2015

ANGELO, KILDAY & KILDUFF, LLP

/s/ Kevin J. Dehoff

By: _____

KEVIN J. DEHOFF
AMIE McTAVISH
Attorneys for Defendants COUNTY OF
YOLO, L. GARCIA, J. CEJA, J.
LAZARO, M. NEVIS, and V.
BIGELOW