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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  
HEARING ON DEFENDANTS' MOTION  
TO DISMISS AND [~~PROPOSED~~] ORDER  
THEREON**

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

)

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

)

19 YOLO COUNTY SHERIFF'S DEPUTY;

)

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.

28 WHEREAS the motion has been fully briefed by the parties.

1 WHEREAS Plaintiff Niesen's counsel is scheduled to begin a jury trial beginning on  
2 April 20, 2015, which is estimated to last four weeks.

3 WHEREAS Defendants have agreed to move the scheduled hearing for the motion to  
4 dismiss until the first available court date May 18, 2015 onward in light of Plaintiff's counsel's  
5 unavailability.

6 WHEREAS the parties had previously agreed to serve initial disclosures in this matter on  
7 or before April 8, 2015.

8 WHEREAS Plaintiff was unable to serve initial disclosures by the previously agreed  
9 upon deadline.

10 WHEREAS Plaintiff has agreed to provide initial disclosures on or before April 24, 2015  
11 negating the need for Defendants to file a motion to compel pursuant to FRCP 37(a)(1).

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

14 1. The hearing for the motion to dismiss currently scheduled for April 20, 2015 is  
15 hereby moved until the first available court day May 18, 2015 at 2:30 p.m..

16 2. Plaintiff agrees to provide her FRCP 26(a)(1)(A) initial disclosures on or before  
17 April 24, 2015.

18  
19  
20 Dated: April 15, 2015

21  
22 LAW OFFICES OF JULIA M. YOUNG

23 /s/ *Julia M. Young*  
24 [as authorized on 4/15/15]

25 By: \_\_\_\_\_  
26 JULIA M. YOUNG  
27 Attorney for Plaintiff THERESA MARIE  
28 NIESEN

Dated: April 15, 2015

ANGELO, KILDAY & KILDUFF, LLP


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*/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

ORDER OF THE COURT

No oral argument will be necessary. The court will take the motion under submission without oral argument. The 4/20/2015 hearing is vacated, and no appearance is necessary.

Dated: April 15, 2015

  
\_\_\_\_\_  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE