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Attorneys for Defendant DEPUTY HER

UNITED STATES DISTRICT COURT  
 EASTERN DISTRICT OF CALIFORNIA  
 SACRAMENTO DIVISION

JASEN LYNN DUSHANE,	)	No. 2:15-cv-0136-TLN-EFB P
	)	
Plaintiff,	)	Hon. Edmund F. Brennan, U.S. Magistrate Judge
	)	
v.	)	
	)	<b>STIPULATION AND [PROPOSED] ORDER</b>
	)	<b>TO EXTEND TIME RE SUMMARY</b>
SACRAMENTO COUNTY MAIN JAIL,	)	<b>JUDGMENT BRIEFING SCHEDULE</b>
DEPUTY HER,	)	
	)	
Defendants.	)	
	)	

Pursuant to Local Rules 143 and 144, Plaintiff JASEN LYNN DUSHANE and Defendant JOHNNY HER, by and through their respective undersigned counsel, stipulate and agree as follows:

1. Plaintiff's counsel, James V. Weixel, Esq., was recently appointed to represent Plaintiff in this action and in three other actions filed by Plaintiff on a limited-purpose basis.

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2. Plaintiff's opposition to Defendant's motion for summary judgment is currently due on April 7, 2016. Defendant's reply, if any, will be due on April 21, 2016.

3. The parties recognize that Mr. Weixel will require some time to familiarize himself with the pleadings and discovery in this matter before being able to prepare a meaningful opposition. The parties have also discussed resolution possibilities, and agree that it would be appropriate to engage in settlement efforts before Plaintiff is required to prepare an opposition and Defendant is required to reply.

4. In light of the foregoing considerations, the parties stipulate and agree that Plaintiff's time to file his opposition to Defendant's motion for summary judgment may be extended by 28 days, up to and including May 5, 2016, and that Defendant's time to file any reply to Plaintiff's opposition may be extended by 28 days, up to and including May 19, 2016. There has been one previous stipulation for an extension of 28 days (ECF 63), when Plaintiff was still proceeding in pro per.

5. The parties respectfully request that the Court enter the order below according to the terms of this stipulation.

Dated: March 31, 2016.

**WEIXEL LAW OFFICE**

By: /s/ James V. Weixel  
James V. Weixel

Attorney for Plaintiff JASEN LYNN DUSHANE

Dated: March 31, 2016.

**LONGYEAR, O'DEA & LAVRA, LLP**

By: /s/ Peter C. Zilaff (as authorized on 3/31/2016)  
Peter C. Zilaff

Attorneys for Defendant DEPUTY HER

**ORDER**

Pursuant to the terms of the stipulation above, IT IS SO ORDERED.

Dated: April 4, 2016.



EDMUND F. BRENNAN  
UNITED STATES MAGISTRATE JUDGE