1	M 1 F M : (G, 1 P N 042040)		
1	Mark E. Merin (State Bar No. 043849) Paul H. Masuhara (State Bar No. 289805)		
2	LAW OFFICE OF MARK E. MERIN 1010 F Street, Suite 300		
3	Sacramento, California 95814 Telephone: (916) 443-6911		
4	Facsimile: (916) 447-8336 E-Mail: mark@markmerin.com		
5	paul@markmerin.com		
6	Attorneys for Plaintiff RICHARD S. MARTIN		
7			
8	Douglas R. Thorn (CA Bar No. 133521) Law Office of Douglas R. Thorn		
9	Olympus Corporate Center 3017 Douglas Boulevard, Suite 300		
10	Roseville, California 95661 (916) 735-9910 drthorn@surewest.net		
11			
12	Attorney for Defendants		
13	TOWN OF PARADISE and PARADISE POLICE DEPARTMENT		
14	UNITED STATES DISTRICT COURT		
15	EASTERN DISTRICT OF CALIFORNIA		
16	SACRAMENTO DIVISION		
17	RICHARD S. MARTIN,	Case No. 2:15-cv-00594-JAM-AC	
18	Plaintiff,	STIPULATION RE FILING OF FIRST	
19	vs.	AMENDED COMPLAINT AND FILING OF RESPONSIVE PLEADING;	
20	TOWN OF PARADISE, PARADISE POLICE	ORDER	
21	DEPARTMENT, and DOES 1 through 50,		
22	Defendants.		
23	The parties hereby stipulate to the following:		
24	1. Plaintiff RICHARD S. MARTIN shall file with the Court a First Amended Complaint on		
25	or before May 29, 2015.		
26	2. The Law Office of Douglas R. Thorn shall accept and waive service of process on behalf		
27	of any named Defendants who are employees of Defendants TOWN OF PARADISE or PARADISE		
28	POLICE DEPARTMENT named in Plaintiff's First Amended Complaint.		
	1	-	

1	3. Defendants named in the First Amended Complaint represented by the Law Office of	
2	Douglas R. Thorn shall file with the Court a responsive pleading to Plaintiff's First Amended Complaint	
3	on or before June 19, 2015. The status of Defendant PARADISE POLICE DEPARTMENT as a public	
4	entity is disputed and reserved for determination in law and motion in the case.	
5	Dated: April 30, 2015  Respectfully Submitted,  Law Orrespond Marry F. Marry	
6	LAW OFFICE OF MARK E. MERIN	
7	/s/ Mark E. Merin	
8	By: Mark E. Merin	
9	Attorney for Plaintiff	
10	RICHARD S. MARTIN	
11		
12	Dated: April 30, 2015 Respectfully Submitted,	
13	Law Office of Douglas R. Thorn	
14	/s/ Douglas R. Thorn	
15	(as authorized on April 30, 2015) By:	
16	Douglas R. Thorn	
17	Attorney for Defendants TOWN OF PARADISE and	
18	PARADISE POLICE DEPARTMENT	
19		
20	<u>ORDER</u>	
21	Pursuant to the parties' stipulation, the foregoing is hereby ORDERED.	
22	Dated: 4/30/2015	
23		
24	/s/ John A. Mendez	
25	JOHN A. MENDEZ, DISTRICT JUDGE UNITED STATES DISTRICT COURT	
26		
27		
28		