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4 Attorneys for Plaintiffs

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UNITED STATES DISTRICT COURT

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EASTERN DISTRICT OF CALIFORNIA

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Sonny Martinez; Jessica Martinez, individually and
 as the mother and Guardian Ad Litem for minors
 VJM, GRM, ARM, and EVM; and Joann Ramirez,

Case No. 2:16-cv-02566-TLN-EFB

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STIPULATION AND ORDER

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Plaintiffs,

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vs.

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City of West Sacramento; West Sacramento Police
 Department; Jason M. Winger; David M. Stallions;
 Michael Duggins; Kenneth E. Fellows; Carl J.
 Crouch; Eric M. Palmer; Matthew S. Luiz; Louis
 Cameron; David Delani; West Sacramento Doe 1
 through 25; City of Stockton; Stockton Police
 Department; Dan T. Zwicky; Stockton Doe 26
 through 50; Yolo County; Yolo County District
 Attorney; Attorney Robert A. Gorman; Attorney
 Ryan J. Couzens; Yolo County Doe 51 through 75;
 Rafael Altamirano; and Doe 76 through 100,

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Defendants.

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1 Counsel for Plaintiffs and counsel for defendant Zwicky and the City of Stockton and its employees
2 and Stockton Police Department and its employees stipulate to give Plaintiffs additional time to file their
3 motions pursuant to the leave granted to them by the Court in its ruling on the Zwicky motion to dismiss
4 and Plaintiffs opposition to the Attorney General's certification of Zwicky as a federal task force agent (See
5 Document 69, Order at 44:10-11). And they stipulate to move the hearing and briefing schedule on the
6 Stockton defendants' motion to dismiss (Document 77) because Plaintiffs' counsel cannot complete all of
7 the work required of counsel under the current deadlines. Plaintiffs except yet another motion to dismiss
8 to be filed by the City of West Sacramento defendants but they have yet to respond to the First Amended
9 Complaint. The stipulating parties therefore agree as follows, subject to the Court's approval:

10 1. The 30-day period the Court gave Plaintiffs to move to amend their First Amended
11 Complaint under its order of February 5, 2019¹ is extended for one-week through March 14, 2019.
12 Pursuant to their earlier stipulation granting defendant Zwicky additional time to respond to whatever
13 motion Plaintiffs file, which the Court approved (Document 82, Order on Stipulation), Plaintiffs and
14 defendant Zwicky shall file a stipulation and proposed order on or before March 6, 2019, regarding the
15 timing of defendant Zwicky's Answer or other response.

16 2. The hearing on the City of Stockton and Stockton Police Department motion to dismiss is
17 moved from March 21, 2019, to April 11, 2019 to give Plaintiffs' counsel 14-days from the date the Zwicky
18 motions referenced in the previous paragraph are due.

19 AGREED

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21 February 27, 2019

/s/ Douglas R. Thorn

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DOUGLAS R. THORN
Attorney for Plaintiffs

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26 ¹ Judge Nunley signed the order on February 4, 2019 but the order was not filed and served until
27 the next day, February 5, 2019. The extra week Plaintiffs' requested is one-week from the date
28 the order was filed.

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February 27, 2019

/s/ Joseph Frueh (written authorized on 27 Feb 2019)

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JOSEPH FRUEH
Attorney for defendant ZWICKY

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February 27, 2019

Jamil Ghannam (written authorization on 27 Feb 2019)

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JAMIL R. GHANNAM
Attorney for defendant CITY OF STOCKTON
and STOCKTON POLICE DEPARTMENT

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ORDER

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The Court has read and considered the Ex-parte Application, declaration of Douglas Thorn, and the Stipulation and Proposed Order to extend time for Plaintiffs to file a motion to amend their First Amended Complaint pursuant to the Court prior order (Document 69) and move the hearing (and briefing schedules under Local Rule 230) on the motion to dismiss filed by the City of Stockton and Stockton Police Department (Document 77) to **April 18, 2019**. Good cause appearing for the requested relief, the Application is granted.

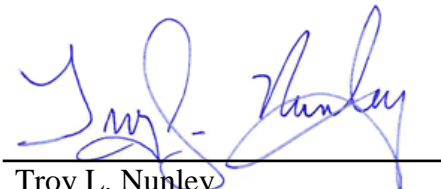
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IT IS SO ORDERED

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Dated: February 28, 2019

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Troy L. Nunley
United States District Judge

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