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5	Attorneys for Plaintiffs					
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7						
8	IN THE UNITED STATES DISTRICT COURT					
9	FOR THE EASTERN DISTRICT OF CALIFORNIA					
10						
11	JANETTE RAMIREZ, individually and as a representative of the Estate of ROBERTO	Case No. 2:17-CV-00228-WBS-AC				
12	BALDIZON, Deceased; ANA	STIPULATION AND [PROPOSED] ORDER TO EXTEND DATE TO FILE				
13		AMENDED COMPLAINT				
14	OF ROBERTO BALDIZON,					
15	Plaintiffs,					
16	V.					
17	JEFFREY MACOMBER, individually and in his official capacity as Former Warden of					
18	California State Prison-Sacramento and DOES 1 through 100, inclusive, in their official					
19	and personal/individual capacities,					
20	Defendants.					
21	I					
22	The parties hereby stipulate that:					
23	1. On December 18, 2017 this Court issued an order dismissing Plaintiff's complaint.					
24	[Docket Entry 39.] Said order gave Plaintiff 20 days from the date of the order to file an					
25	amended complaint. The complaint was due January 7, 2018. The parties stipulated an					
26	amended complaint could be filed on February 21, 2018.					
27	2. Plaintiff requested certain evidence from the California Department of Corrections in					
28	order to assist Plaintiff in drafting an amended complaint. Plaintiff has not yet received					
	{00023731} STIP AND ORDER – AMENDED COMPLAINT – 1 –	CASE NO. 2:17-CV-00228-WBS-AC				

BARTH DALY LLP ATTORNEYS AT LAW SACRAMENTO, CALIFORNIA

1	said informat	said information and cannot file an amended complaint consistent with this Court's order				
2	absent this information.					
3						
4	1	. The parties have conferred regarding Plaintiff's efforts to obtain such evidence and				
5		reasonably expect Plaintiff will receive the evidence in approximately 30 days.				
6		 Plaintiff seeks additional time to file an amended complaint, to April 13, 2018. Defendent descent abject 				
7		5. Defendant does not object.				
8	Dated: February 20,		spectfully submitted,			
9		BA	RTH DALY LLP			
10		By_	/s/ Kresta Nora Daly KRESTA NORA DALY			
11		Att	torneys for Plaintiffs			
12		XA	VIER BECERRA			
13	Attorney General of California MONICA N. ANDERSON					
14		Suj	pervising Deputy Attorney Gene	oral		
15		By	/s/ R. Lawrence Bragg			
16	R. LAWRENCE BRAGG Acting Supervising Deputy Attorney General					
17			orneys for Defendant Macombe			
18						
19	ORDER					
20	Good cause appearing the deadline for Plaintiff to file an amended complaint is extended			d complaint is extended		
21	to April 13, 2018.		1			
22	Dated: February 21,		VILLIAM B. SHUBB	hibt.		
23			NITED STATES DISTRICT	JUDGE		
23 24						
2 4 25						
25 26						
20 27						
27						
20	(0002221)					
	{00023731} STIP AND ORDER – AMENE	ED COMPLAINT	- 2 -	CASE NO. 2:17-CV-00228-WBS-AC		