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Amar Ghandi, and Tamiko Abbott

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Attorneys for Plaintiffs
DAVON WILLIAMS and JAMES FRANKLIN

IN THE UNITED STATES DISTRICT COURT

IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA

DAVON WILLIAMS and JAMES
FRANKLIN,

Plaintiffs,

v.

COUNTY OF SACRAMENTO,
SACRAMENTO COUNTY SHERIFF'S
DEPARTMENT, et al.,

Defendants.

) CASE NO: 2:17-cv-01726-JAM-EFB
)
)

) **STIPULATION FOR LEAVE TO AMEND**
) **DEFENDANTS COUNTY OF**
) **SACRAMENTO AND SACRAMENTO**
) **COUNTY SHERIFF'S DEPARTMENT'S**
) **ANSWER TO FIRST AMENDED**
) **COMPLAINT; ORDER**

BY AND THROUGH THEIR RESPECTIVE COUNSELS OF RECORD, Plaintiffs

Davon Williams and James Franklin (collectively "Plaintiffs") and Defendants County of

1 Sacramento, Sacramento County Sheriff's Department, Amar Gandhi, and Tamiko Abbott
2 (collectively "Defendants") hereby stipulate and agree that Defendants County of Sacramento
3 and Sacramento County Sheriff's Department be permitted leave to file an amendment to their
4 Answer [Doc. 17] to Plaintiffs' First Amended Complaint [Doc. 12]. The parties further
5 stipulate that good cause exists for leave to amend, following meet and confer efforts between
6 the parties during which it was agreed that Defendants County of Sacramento and Sacramento
7 County Sheriff's Department would withdraw affirmative defenses asserted in their Answer
8 [Doc. 17] without prejudice in order to streamline the parties' allegations and defenses and to
9 avoid unnecessary motion practice. The parties further stipulate that, upon approval of this
10 Stipulation by the Court, the [Proposed] First Amended Answer to Plaintiffs' First Amended
11 Complaint for Violation of Civil and Constitutional Rights, attached hereto as Exhibit A should
12 be deemed filed and serve as the operative responsive pleading by Defendants County of
13 Sacramento and Sacramento County Sheriff's Department.

14 IT IS SO STIPULATED.

15 DATED: December 7, 2017

LAW OFFICES OF MARK E. MERIN

(As authorized on December 7, 2017)

/s/ Paul H. Masuhara

Mark E. Merin

Paul H. Masuhara

Attorney for Plaintiffs

Davon Williams and James Franklin

21 DATED: December 7, 2017

LAW OFFICES OF RIVERA & ASSOCIATES

/s/ Glen A. Williams

Jonathan B. Paul

Glen A. Williams

Attorney for Defendants

County of Sacramento and Sacramento County

Sheriff's Department

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PROPOSED ORDER

PURSUANT TO STIPULATION AND GOOD CAUSE BEING SHOWN, IT IS HEREBY ORDERED that Defendants County of Sacramento and Sacramento County Sheriff’s Department are granted leave to amend their Answer [doc. 12].

IT IS FURTHER ORDERED that Defendants County of Sacramento and Sacramento County Sheriff’s Department’s [Proposed] First Amended Answer To Plaintiffs’ First Amended Complaint For Violation Of Civil And Constitutional Rights, attached hereto as Exhibit A is deemed filed and shall serve as the operative responsive pleading by Defendants County of Sacramento and Sacramento County Sheriff’s Department.

IT IS SO ORDERED.

Dated: 12/08/2017

/s/ John A. Mendes
U.S. District Court Judge