1 2 3	Jeff Dominic Price SBN 165534 2500 Broadway, Suite 125 Santa Monica, California 90404 jeff.price@icloud.com Tel. 310.451.2222		
4	Attorney for Plaintiff		
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8	UNITED STATES DISTRICT COURT		
9	EASTERN DISTRICT OF CALIFORNIA		
10	DENISE L. BRADLEY,	Case No. 2:17-CV-02313-KJM-ACx	
11	Plaintiff,	STIPULATION AND ORDER TO	
12	VS.	AMENDED COMPLAINT IN RESPONSE TO DEFENDANTS'	
13	COUNTY OF SAN JOAQUIN, et al.,		
14	Defendants.		
15	TO: THE HONORABLE KIMBERLY J. N	IUELLER, UNITED STATES DISTRICT JUDGE	
16	AND TO THE DEFENDANTS AND THEIR ATTORNEYS OF RECORD:		
17	WHEREFORE the parties, thou	gh their counsel of record, have met and	
18	conferred and, for good cause, have ag	reed to stipulate to the filing of an amended	
19	complaint until March 14, 2018.		
20	1. On December 28, 2017, I	Defendants' counsel requested and Plaintiff's	
21	counsel agreed to stipulate to a 30-day	extension of time for Defendants to move,	
22	plead or otherwise respond to the Orig	inal Complaint. (Doc. #9)	
23	2. The Stipulation additional	lly provided that Defendants will stipulate to	
24	allow Plaintiff to file a First Amended	Complaint. (Doc. #9)	
25	3. On January 2, 2018, Unite	ed States Magistrate Judge Allison Claire	
26	signed the Order on the Stipulation. (D	oc. #9)	
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28			
	1 – STIP TO FILING AMENDED COMPLAINT		

1	4. On February 1, 2018 Defendants filed a Motion to Dismiss for Failure	
2	to State A Claim. (Doc. #12).	
3	IT IS STIPULATED that the Plaintiff may file an amended complaint on or	
4	before March 14, 2018.	
5		
6	IT IS SO STIPULATE	
7	Dated: March 7, 2018	JEFF DOMINIC PRICE, Esq.
8		/s/ Jeff Dominic Price Jeff Dominic Price
9		Attorney for Plaintiff
10		
11	Dated: March 7, 2018	HERUM CRABTREE SUNTAG
12		A California Professional Corporation
13		/s/ Dana A. Suntag
14		Dana A. Suntag Attorney for All Defendants
15		Anomey for An Defendants
16		I, Jeff Price, attest that I have authority from Dana
17		A. Suntag to file this document.
18		/s/ Jeff Dominic Price Jeff Price
19		Attorney for Plaintiff
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21		
22	DECLARATION OF JEFF DOMINIC PRICE	
23	1, Jen Dominic Price, state.	
24	1. I am the attorney for the plantin and this declaration is submitted in	
25	support of the Supulation and I can testify to the following facts of my own personal	
26	knowledge.	
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28		
	2 – STIP TO FILING AMENDED COM	MPLAINT

1	2. Over the last four weeks, I have been engaged, <i>inter alia</i> , in conducting
2	extensive discovery including preparing for and conducting depositions, prior to the
3	March 5, 2018 close of discovery, in a case in the Central District of California,
4	Spangler v. County of Ventura, et al., 2:16-cv-09174-ODW-GJSx.
5	3. As a result of Plaintiff's counsel work on <i>Spangler</i> , <i>inter alia</i> , the
6	parties have stipulated to an extension of time for Plaintiff to file an amended
7	complaint in response to Defendants' Motion to Dismiss.
8	I declare under penalty of perjury that the foregoing is true and correct.
9	Executed this 1st day of March, 2018, at Santa Monica, California,
10	
11	/s/ Jeff Dominic Price
12	Jeff Dominic Price
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16	ORDER
17	Based on the Stipulation of Counsel, and good cause shown, the Court grants
17 18	Based on the Stipulation of Counsel, and good cause shown, the Court grants the stipulated extension of time requested. Plaintiff's amended complaint shall be
18	the stipulated extension of time requested. Plaintiff's amended complaint shall be
18 19	the stipulated extension of time requested. Plaintiff's amended complaint shall be due on or before March 14, 2018.
18 19 20	the stipulated extension of time requested. Plaintiff's amended complaint shall be due on or before March 14, 2018.
18 19 20 21	the stipulated extension of time requested. Plaintiff's amended complaint shall be due on or before March 14, 2018. DATED: March 12, 2018.
18 19 20 21 22	the stipulated extension of time requested. Plaintiff's amended complaint shall be due on or before March 14, 2018. DATED: March 12, 2018.
18 19 20 21 22 23	the stipulated extension of time requested. Plaintiff's amended complaint shall be due on or before March 14, 2018. DATED: March 12, 2018.
18 19 20 21 22 23 24	the stipulated extension of time requested. Plaintiff's amended complaint shall be due on or before March 14, 2018. DATED: March 12, 2018.
18 19 20 21 22 23 24 25 26 27	the stipulated extension of time requested. Plaintiff's amended complaint shall be due on or before March 14, 2018. DATED: March 12, 2018.
18 19 20 21 22 23 24 25 26	the stipulated extension of time requested. Plaintiff's amended complaint shall be due on or before March 14, 2018. DATED: March 12, 2018.
18 19 20 21 22 23 24 25 26 27	the stipulated extension of time requested. Plaintiff's amended complaint shall be due on or before March 14, 2018. DATED: March 12, 2018.