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5 Attorney for Defendants  
 Rosemary Frieborn; Curt Ransom; Marilyn  
 6 Jasper; Cassie Reeves; Katie Newman; Sherry  
 Couzens; Michael Crosson; Shana Laursen;  
 7 Humane Society of the Sierra Foothills; Friends  
 8 of Placer County Animal Shelter; Friends of  
 Auburn/Tahoe Vista Placer County Animal  
 9 Shelter; Friends of Auburn/Tahoe Vista-Placer  
 County Animal Shelter, Inc.; Edward J. Fritz  
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11 **UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

12  
 13 JAMES DAHLIN; KIMBERLY DAHLIN;  
 TOBY TIPPETS; and MARTINA TIPPETS,

14 Plaintiffs,

15 v.

16 ROSEMARY FRIEBORN; CURT RANSOM;  
 17 MARILYN JASPER; CASSIE REEVES;  
 KATIE NEWMAN; SHERRY COUZENS;  
 18 MICHAEL CROSSON; THOMAS SHERIFF,  
 DVM; SHANA LAURSEN; HUMANE  
 19 SOCIETY OF THE SIERRA FOOTHILLS,  
 INC., a California nonprofit corporation;  
 20 FRIENDS OF PLACER COUNTY ANIMAL  
 SHELTER, an unincorporated association;  
 21 FRIENDS OF AUBURN/TAHOE VISTA  
 PLACER COUNTY ANIMAL SHELTER, an  
 22 unincorporated association; FRIENDS OF  
 AUBURN/TAHOE VISTA-PLACER  
 23 COUNTY ANIMAL SHELTER, INC., a  
 California nonprofit corporation; Doe 1  
 24 through Doe 125; EDWARD J. FRITZ; CITY  
 OF AUBURN; AUBURN POLICE  
 25 DEPARTMENT; Officer DEBBIE NELSON;  
 Officer PHILLIP ISETTA; Officer ANGELA  
 26 MCCOLLOUGH; Sergeant TUCKER HUEY;  
 Doe 126 through 150,

27 Defendants.  
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Case No. 2:17-cv-02585-MCE-AC

**STIPULATION AND ORDER TO  
 EXTEND TIME FOR ALL  
 DEFENDANTS TO RESPOND TO  
 PLAINTIFFS' SECOND AMENDED  
 COMPLAINT**

Judge: Hon. Morrison C. England, Jr.  
 Action Filed: December 9, 2017

1           WHEREAS, on November 25, 2019, Plaintiffs James Dahlin, Kimberly Dahlin, Toby  
2 Tippetts and Martina Tippetts (collectively, the “Plaintiffs”) filed their Second Amended  
3 Complaint (“SAC”) in the above-captioned matter in the United States District Court, Eastern  
4 District of California, against Defendants Rosemary Frieborn, Curt Ransom, Marilyn Jasper,  
5 Cassie Reeves, Katie Newman, Sherry Couzens, Michael Crosson, Shana Laursen, the Humane  
6 Society of the Sierra Foothills, Inc., Friends of Auburn/Tahoe Vista-Placer County Animal  
7 Shelter, Inc., Friends of Placer County Animal Shelter, Friends of Auburn/Tahoe Vista Placer  
8 County Animal Shelter, and Edward Fritz (collectively, the “Non-Municipal Defendants”), City  
9 of Auburn, Auburn Police Department, Officer Debbie Nelson, Officer Phillip Isetta, Officer  
10 Angela McCollough, and Sergeant Tucker Huey (collectively, the “Municipal Defendants”), and  
11 Thomas Sheriff;

12           WHEREAS, the current deadline for all Defendants to respond to Plaintiffs’ SAC is 14  
13 days after service of the SAC, i.e., on December 9, 2019 (*see* Fed. R. Civ. P. 15(a)(3));

14           WHEREAS, Plaintiffs’ SAC (78 pages and 240 numbered paragraphs) is more than twice  
15 as long as their previously-filed First Amended Complaint (37 pages and 194 numbered  
16 paragraphs) (*see* Doc. 37 & Doc. 103);

17           WHEREAS, in light of the length of the SAC as well as holiday-related scheduling  
18 difficulties, all Defendants require additional time within which to investigate and adequately  
19 respond to Plaintiffs’ SAC; and

20           WHEREAS, the Plaintiffs, Non-Municipal Defendants, Municipal Defendants, and  
21 Thomas Sheriff agree that the interests of efficiency and justice will be promoted if all presently-  
22 served Defendants file their responses to the SAC at the same time;

23           NOW, THEREFORE, PURSUANT TO EASTERN DISTRICT LOCAL RULE 144(A),  
24 IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the Plaintiffs, the  
25 Non-Municipal Defendants, Municipal Defendants, and Thomas Sheriff that the deadline for all  
26 Defendants to file their answer or other response to Plaintiffs’ SAC is extended to December 31,  
27 2019.

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**SO STIPULATED AND AGREED.**

Dated: December 2, 2019.

DENNISE HENDERSON  
LAW OFFICE OF DENNISE HENDERSON

BY:  /s/ Dennise Henderson  
(signature authorized December 2,  
2019)

Attorney for Plaintiffs

Dated: December 2, 2019.

CHRIS A. HOLLINGER  
O'MELVENY & MYERS LLP

By:  /s/ Chris A. Hollinger  
Chris A. Hollinger

Attorney for Non-Municipal Defendants

Dated: December 2, 2019.

SERENA M. WARNER  
ANGELO, KILDAY & KILDUFF LLP

By:  /s/ Serena M. Warner  
(signature authorized December 2,  
2019)

Attorney for Municipal Defendants

Dated: December 2, 2019.


LAWRENCE E. SKIDMORE  
ARONOWITZ SKIDMORE LYON

By:  /s/ Lawrence E. Skidmore  
(signature authorized December 2,  
2019)

Attorney for Defendant Thomas Sheriff

IT IS SO ORDERED.

DATED: January 6, 2020

  
\_\_\_\_\_  
MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE