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1 **PORTER | SCOTT**
2 A PROFESSIONAL CORPORATION
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9 Attorneys for Defendants
10 COUNTY OF SACRAMENTO, JOYCELYN WORMLEY, SAMATHA SACHEO, EVA
11 BERMUDEZ, SHERRI HELLER, TISH BIANEZ, PAOLIS REED

12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF CALIFORNIA

14 DAVID M. ALDEN, an individual and
15 SARAH J. BOWMAN ALDEN, an
16 individual,

17 Plaintiffs,

18 v.

19 COUNTY OF SACRAMENTO, a public
20 entity; JOYCELYN WORMLEY,
21 individually, SAMATHA SACHEO,
22 individually, EVA BERMUDEZ,
23 individually, SHERRI HELLER,
24 individually, TISH BIANEZ, individually,
25 PAOLIS REED, individually and DOES 1
26 through 50, inclusive,

27 Defendants.

CASE NO. 2:17-CV-02629-KJM-AC
PS

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
DEFENDANTS' TO RESPOND TO
ANSWER COMPLAINT**

Complaint Filed: 01/17/2018

28 Plaintiffs DAVID M. ALDEN and SARAH J. BOWMAN ALDEN and Defendants
COUNTY OF SACRAMENTO, JOYCELYN WORMLEY, SAMATHA SACHEO, EVA
BERMUDEZ, SHERRI HELLER, TISH BIANEZ, and PAOLIS REED, by and through their
counsel of record, hereby agree to extend the time for Defendants to file an Answer to the First
Amended Complaint of Plaintiffs to April 17, 2018.

The parties have commenced the meet and confer process, and stipulate to the following:

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- 1) As pleaded in the First Amended Complaint; Plaintiffs have stated claims upon which relief can be granted;
- 2) Due to defendants' availability of counsel and the contemplation of admitted facts and defendants wish to avoid the necessity of amending their Answer; additional time is needed to explore the issues;
- 3) In this context, plaintiffs agree to defendants' request for an extension of time, solely for the purpose of preparing, serving and filing an Answer to the Plaintiffs' First Amended Complaint;
- 4) Thus, good cause exists for an extension of time for Defendants to file an Answer to the Plaintiffs' First Amended Complaint;
- 5) Accordingly, the Parties stipulate to extend the time for defendants to file an Answer to the Plaintiffs' First Amended Complaint until April 17, 2018.

Respectfully Submitted,

Dated: April 11, 2018

PORTER SCOTT
A PROFESSIONAL CORPORATION

By: /s/ Taylor W. Rhoan
Taylor W. Rhoan (SBN 294941)
Attorney for Defendants

Dated: April 11, 2018

By: _____
DAVID M. ALDEN
PLAINTIFF PRO SE

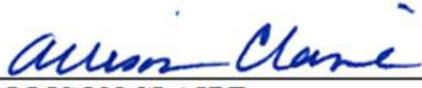
Dated: April 11, 2018

By: _____
SARAH J. BOWMAN ALDEN
PLAINTIFF PRO SE

[PROPOSED] ORDER

IT IS SO ORDERED.

Date: April 11, 2018



ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE

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