DANA A. SUNTAG (State Bar No. 125127) JOSHUA J. STEVENS (State Bar No. 238105) 1 2 HERUM\CRABTREE\SUNTAG A California Professional Corporation 3 5757 Pacific Avenue, Suite 222 Stockton, California 95207 Telephone: (209) 472-7700 Facsimile: (209) 472-7986 4 dsuntag@herumcrabtree.com 5 istevens@herumcrabtree.com 6 Attorneys for Defendants 7 THE COUNTY OF SAN JOAQUIN and SHERIFF STEVE MOORE 8 UNITED STATES DISTRICT COURT 9 **EASTERN DISTRICT OF CALIFORNIA** 10 11 JANE DOE, Case No.: 2:18-cv-00667-TLN-AC 12 Plaintiff, 13 STIPULATION AND ORDER FOR SECOND EXTENSION OF TIME TO FILE VS. **RESPONSE TO FIRST AMENDED** 14 SAN JOAQUIN COUNTY; SHERIFF COMPLAINT PENDING SETTLEMENT STEVE MOORE, DANNY SWANSON, 15 and DOES 1 through 25, 16 [E.D. Local Rule 144; Fed. R. Civ. P. 6] Defendants. 17 18 19 20 21 22 23 24 25 26 27 28 HERUM CRABTREE SUNTAG STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING

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Doe v. San Joaquin County et al

Pursuant to Eastern District Civil Local Rule 144 and Federal Rule of Civil Procedure 6, Defendants San Joaquin County, Sheriff Steve Moore, and Danny Swanson (collectively "Defendants") and Plaintiff Jane Doe ("Plaintiff"), by and through their attorneys of record, stipulate to an extension of time for all Defendants to move, plead, or otherwise respond to Plaintiff's First Amended Complaint ("FAC"), as follows:

- 1. On June 9, 2019, Plaintiff filed her FAC, alleging various federal and state law claims.
- 2. The parties agreed to conduct a mediation; therefore, on June 13, 2019, the parties filed a stipulation extending Defendants' time to respond to Plaintiff's FAC to August 19, 2019, pending the mediation, which the Court so ordered on June 14, 2019.
- 3. On August 5, 2019, all parties and their counsel attended the mediation. At the mediation, they were able to reach a global settlement of the entire action subject to certain specific conditions. If the conditions are satisfied, this entire action will be dismissed with prejudice.
- 4. The parties anticipate it will take approximately 60 days to finalize the settlement documents and perform these conditions.
- 5. The parties thus request that Defendants' time to move, plead, or otherwise respond to Plaintiff's FAC be extended 90 days, through and including November 18, 2019. There is no trial date and the Court has not yet issued a Rule 16 scheduling order.

Based on the foregoing, IT IS STIPULATED, by and between all parties through their respective counsel of record, that:

(1) Defendants San Joaquin County and Sheriff Steve Moore's deadline to move, plead, or otherwise respond to the FAC be extended through and including November 18, 2019.

1	(2) Defendant Danny Swanson's deadline to move, plead, or otherwise respor	
2	to the FAC be extended through and including November 18, 2019.	
3	IT IS SO STIPULATED.	
4	Dated: August 7, 2019	HERUM CRABTREE SUNTAG A California Professional Corporation
5		By:/s/ Dana A. Suntag
6 7		DANA A. SUNTAG Attorneys for Defendants COUNTY OF SAN JOAQUIN and
		SHERIFF STEVE MOORE
8 9	Dated: August 7, 2019	BURKE, WILLIAMS, & SORENSEN, LLP
		By: /s/ Gregory B. Thomas
10 11		GREGORY B. THOMAS Attorneys for Defendant DANNY SWANSON
12	Dated: August 7, 2019	LAW OFFICES OF STANLEY GOFF
13		By: /s/ Stanley Goff
14		STANLEY GOFF, ESQ. Attorneys for Plaintiff JANE DOE
15		
16	ORDER IN CONSIDERATION of the parties' Stipulation, and for good cause show	
17	therein, it is ORDERED that Defendants' deadline to move, plead, or otherwise respon	
18	to Plaintiff's First Amended Complaint is extended from August 19, 2019 through an	
19	including November 18, 2019.	
20	Dated: August 7, 2019	
21		Van Vanley
22		Troy L. Nunley
23		United States District Judge
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26		
27		
28		