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12	Attorneys for Defendants COUNTY OF PLUMAS and SHERIFF GREG	
13	HAGWOOD	
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15		ATES DISTRICT COURT
16		TATES DISTRICT COURT RN DISTRICT OF CALIFORNIA
16 17	IN AND FOR THE EASTE	RN DISTRICT OF CALIFORNIA
16 17 18	IN AND FOR THE EASTE	RN DISTRICT OF CALIFORNIA CASE NO: 2:19-CV-1984-KJM-KJN
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16 17 18 19 20	IN AND FOR THE EASTED LYNNE LOESCHER, Plaintiff, vs.	RN DISTRICT OF CALIFORNIA CASE NO: 2:19-CV-1984-KJM-KJN STIPULATION and ORDER FOR AN
16 17 18 19	IN AND FOR THE EASTED LYNNE LOESCHER, Plaintiff, vs. COUNTY OF PLUMAS, PLUMAS COUNTY SHERIFF GREG HAGWOOD,	CASE NO: 2:19-CV-1984-KJM-KJN STIPULATION and ORDER FOR AN EXTENSION OF TIME TO FILE A RESPONSIVE PLEADING TO SECOND AMENDED COMPLAINT
16 17 18 19 20 21	IN AND FOR THE EASTED LYNNE LOESCHER, Plaintiff, vs. COUNTY OF PLUMAS, PLUMAS COUNTY SHERIFF GREG HAGWOOD, CALIFORNIA HIGHWAY PATROL OFFICER SARGENT KELLY SERIAL	CASE NO: 2:19-CV-1984-KJM-KJN STIPULATION and ORDER FOR AN EXTENSION OF TIME TO FILE A RESPONSIVE PLEADING TO SECOND
16 17 18 19 20 21 22	IN AND FOR THE EASTED LYNNE LOESCHER, Plaintiff, vs. COUNTY OF PLUMAS, PLUMAS COUNTY SHERIFF GREG HAGWOOD, CALIFORNIA HIGHWAY PATROL	CASE NO: 2:19-CV-1984-KJM-KJN STIPULATION and ORDER FOR AN EXTENSION OF TIME TO FILE A RESPONSIVE PLEADING TO SECOND AMENDED COMPLAINT
16 17 18 19 20 21 22 23	IN AND FOR THE EASTED LYNNE LOESCHER, Plaintiff, vs. COUNTY OF PLUMAS, PLUMAS COUNTY SHERIFF GREG HAGWOOD, CALIFORNIA HIGHWAY PATROL OFFICER SARGENT KELLY SERIAL NUMBER 52, and DOES 1through 50,	CASE NO: 2:19-CV-1984-KJM-KJN STIPULATION and ORDER FOR AN EXTENSION OF TIME TO FILE A RESPONSIVE PLEADING TO SECOND AMENDED COMPLAINT
16 17 18 19 20 21 22 23 24	IN AND FOR THE EASTED LYNNE LOESCHER, Plaintiff, vs. COUNTY OF PLUMAS, PLUMAS COUNTY SHERIFF GREG HAGWOOD, CALIFORNIA HIGHWAY PATROL OFFICER SARGENT KELLY SERIAL NUMBER 52, and DOES 1through 50,	CASE NO: 2:19-CV-1984-KJM-KJN STIPULATION and ORDER FOR AN EXTENSION OF TIME TO FILE A RESPONSIVE PLEADING TO SECOND AMENDED COMPLAINT
16 17 18 19 20 21 22 23 24 25	IN AND FOR THE EASTED LYNNE LOESCHER, Plaintiff, vs. COUNTY OF PLUMAS, PLUMAS COUNTY SHERIFF GREG HAGWOOD, CALIFORNIA HIGHWAY PATROL OFFICER SARGENT KELLY SERIAL NUMBER 52, and DOES 1through 50, inclusive,	CASE NO: 2:19-CV-1984-KJM-KJN STIPULATION and ORDER FOR AN EXTENSION OF TIME TO FILE A RESPONSIVE PLEADING TO SECOND AMENDED COMPLAINT
16 17 18 19 20 21 22 23 24 25 26	IN AND FOR THE EASTED LYNNE LOESCHER, Plaintiff, vs. COUNTY OF PLUMAS, PLUMAS COUNTY SHERIFF GREG HAGWOOD, CALIFORNIA HIGHWAY PATROL OFFICER SARGENT KELLY SERIAL NUMBER 52, and DOES 1through 50, inclusive,	CASE NO: 2:19-CV-1984-KJM-KJN STIPULATION and ORDER FOR AN EXTENSION OF TIME TO FILE A RESPONSIVE PLEADING TO SECOND AMENDED COMPLAINT

RIVERA HEWITT PAUL LLP 11341 Gold Express Drive, Suite 160 Gold River, CA 95670 (916) 922-1200

STIPULATION AND ORDER FOR AN EOT TO FILE RESPONSIVE PLEADING Case No. 2:18-cv-01020 MCE EFB

1	Plaintiff, by and through her counsel Larry L. Baumbach, Esq. of the Law Offices of		
2	Larry L. Baumbach and Defendants County of Plumas and Sheriff Greg Hagwood, by and		
3	through their counsel Shanan L. Hewitt, Esq. of the Law Offices of Rivera Hewitt Paul LLP,		
4	hereby stipulate pursuant to Local Rule of Court 144(a) to an extension of time in order to permi		
5	Defendants County of Plumas and Sheriffs Greg Hagwood to file a responsive pleading to		
6	Plaintiff's Second Amended Complaint (Doc. 35) filed on October 30, 2020. The parties stipulate		
7	and have agreed to extend the responsive pleading deadline as follows:		
8	(1) The undersigned defense counsel is currently working on additional matters which have		
9	upcoming litigation deadlines including, but not limited to, an extensive motion for		
10	summary judgment and a request to seal documents in Pervez v. Bacerra, et al., Case No.		
11	2:18-cv-02793-KJM-KJN which is due by November 13, 2020, in addition to several		
12	depositions in other cases during the week of November 2, 2020.		
13	(2) In order to thoroughly review the Second Amended Complaint, research and evaluate		
14	whether a motion to dismiss is warranted and allow sufficient time for the parties to mee		
15	and confer prior to the filing of such a motion, Defendants County of Plumas and Sherif		
16	Hagwood respectfully request an extension of time to file a responsive pleading.		
17	Plaintiff's counsel has kindly agreed to stipulate to this request.		
18	(3) The parties have agreed and hereby stipulate to extend the time for Defendants County of		
19	Plumas and Sheriff Greg Hagwood to respond to the Second Amended Complaint (Doc.		
20	35) from the original deadline of November 13, 2020 up to and including November 25,		
21	2020.		
22	IT IS SO STIPULATED.		
23			
24	Dated: November 6, 2020 RIVERA HEWITT PAUL LLP		
25			
26	<u>/s/ Shanan L. Hewitt</u> SHANAN L. HEWITT		
27	Attorneys for Defendants		
28	COUNTY OF PLUMAS and SHERIFF GREG HAGWOOD		

1	Dated: November 10, 2020 LA	W OFFICES OF LARRY L. BAUMBACH	
2 3		Larry L. Baumbach	
4	Att	RRY L. BAUMBACH orney for Plaintiff NNE LOESCHER	
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6	<u>ORDER</u>		
7	GOOD CAUSE having been shown, the foregoing stipulated request for an extension of		
8	time for Defendants COUNTY OF PLUMAS and SHERIFF GREG HAGWOOD to file a		
9	responsive pleading to Plaintiff's Second Amended Complaint (Doc. 35) is HEREBY		
10	GRANTED. Defendants shall file and serve their responsive pleading to Plaintiff's Second		
11	Amended Complaint no later than November 25, 2020.		
12	IT IS SO ORDERED.		
13		100 00 10	
14	Dated: November 13, 2020	CHIEF UNITED STATES DISTRICT JUDGE	
15		Similar Signature Signatur	
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