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14 Attorneys for Defendants
 15 COUNTY OF SAN JOAQUIN,
 DAVID KWONG, and JUANITA M. HUERTA

16 UNITED STATES DISTRICT COURT
 17 EASTERN DISTRICT OF CALIFORNIA
 18 SACRAMENTO DIVISION

19 HOFFMAN BROS. HARVESTING, INC., et al.,
 20 Plaintiffs,
 21 vs.
 22 COUNTY OF SAN JOAQUIN, et al.,
 23 Defendants.

Case No. 2:20-cv-00660-TLN-AC

**JOINT STIPULATION TO CONTINUE
 HEARING ON MOTION TO DISMISS;
 ORDER**

24 Pursuant to E.D. Cal. L.R. 230(f), the parties—Plaintiffs Hoffman Brothers Harvesting, Inc., Paul
 25 D. Hoffman & Sons, Ronald E. Hoffman, and Carl R. Hoffman (collectively, “Plaintiffs”) and
 26 Defendants County of San Joaquin, David Kwong, and Juanita M. Huerta (collectively, “Defendants”)—
 27 submit the following joint stipulation to continue the hearing date on Defendants’ pending motion to
 28 dismiss (ECF No. 6).

1 **STIPULATION**

2 WHEREAS, Defendants’ pending motion to dismiss was originally noticed and scheduled for
3 hearing on July 23, 2020 (ECF No. 6);

4 WHEREAS, the parties jointly stipulated to continue the hearing to September 17, 2020 (ECF
5 No. 8), and the Court granted the stipulation (ECF No. 9);

6 WHEREAS, the parties jointly stipulated to further continue the hearing to November 12, 2020
7 (ECF No. 10), and the Court granted the stipulation (ECF No. 11);

8 WHEREAS, the parties jointly stipulated to further continue the hearing to January 21, 2021
9 (ECF No. 12), and the Court granted the stipulation (ECF No. 13); and

10 WHEREFORE, the parties’ counsel have discussed, and continue to discuss, potential early
11 alternative dispute resolution in this case and a further continuance of the hearing date is necessary to
12 facilitate these settlement discussions—specifically, Defendants have made a proposal to resolve the
13 parties’ dispute and, most recently, Plaintiffs have made a counter-proposal, which Defendants intend to
14 consider;

15 NOW, THEREFORE, the parties agree and stipulate that:

16 Defendants’ pending motion to dismiss, currently scheduled to be heard before this Court January
17 21, 2021, be CONTINUED to February 18, 2021, at 2:00 p.m.

18 IT IS SO STIPULATED.

19 Dated: January 6, 2021

Respectfully Submitted,
LAW OFFICE OF MARK E. MERIN

/s/ Mark E. Merin

22 By: _____
Mark E. Merin

23 Attorney for Plaintiffs
24 HOFFMAN BROTHERS HARVESTING, INC.,
25 PAUL D. HOFFMAN & SONS, RONALD E.
26 HOFFMAN, and CARL R. HOFFMAN

1 Dated: January 6, 2021

Respectfully Submitted,
COLE HUBER LLP

2
3 /s/ *Derek P. Cole*
(as authorized on January 6, 2021)

4 By: _____

5 Derek P. Cole
6 Ronald J. Scholar

7 Attorneys for Defendants
8 COUNTY OF SAN JOAQUIN,
9 DAVID KWONG, and JUANITA M. HUERTA

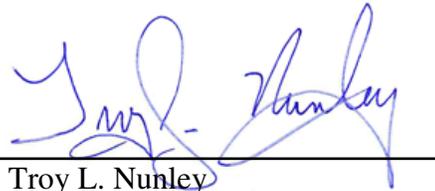
10
11 **ORDER**

12 GOOD CAUSE APPEARING, the parties' stipulation is GRANTED.

13 Defendants' pending motion to dismiss (ECF No. 6), currently scheduled to be heard before this
14 Court on January 21, 2021, is CONTINUED to February 18, 2021, at 2:00 p.m.

15 IT IS SO ORDERED.

16 Dated: January 7, 2021

17
18 

19 Troy L. Nunley
20 United States District Judge