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21 Attorneys for Defendants
 22 COUNTY OF SAN JOAQUIN,
 23 DAVID KWONG, and JUANITA M. HUERTA

24 UNITED STATES DISTRICT COURT
 25 EASTERN DISTRICT OF CALIFORNIA
 26 SACRAMENTO DIVISION

27 HOFFMAN BROS. HARVESTING, INC., et al.,
 28 Plaintiffs,
 vs.
 COUNTY OF SAN JOAQUIN, et al.,
 Defendants.

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

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

29 Pursuant to E.D. Cal. L.R. 230(f), the parties—Plaintiffs Hoffman Brothers Harvesting, Inc., Paul
 30 D. Hoffman & Sons, Ronald E. Hoffman, and Carl R. Hoffman (collectively, “Plaintiffs”) and
 31 Defendants County of San Joaquin, David Kwong, and Juanita M. Huerta (collectively, “Defendants”)—
 32 submit the following joint stipulation to continue the hearing date on Defendants’ pending motion to
 33 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);

10 WHEREAS, the parties jointly stipulated to further continue the hearing to February 18, 2021
11 (ECF No. 14), and the Court granted the stipulation (ECF No. 15); and

12 WHEREAS, the parties jointly stipulated to further continue the hearing to April 15, 2021 (ECF
13 No. 16), and the Court granted the stipulation (ECF No. 17); and

14 WHEREFORE, the parties’ counsel have discussed, and continue to discuss, potential early
15 alternative dispute resolution in this case and a further continuance of the hearing date is necessary to
16 facilitate these settlement discussions—specifically, the parties have each made and discussed proposals
17 to resolve the parties’ dispute and, most recently, continue to discuss and consider counter-proposals; and

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

19 Defendants’ pending motion to dismiss (ECF No. 6), currently scheduled to be heard before this
20 Court on April 15, 2021, shall be CONTINUED to April 29, 2021, at 2:00 p.m.

21 IT IS SO STIPULATED.

22 Dated: March 26, 2021

Respectfully Submitted,
LAW OFFICE OF MARK E. MERIN

23 /s/ Mark E. Merin

24 By: _____
25 Mark E. Merin

26 Attorney for Plaintiffs
27 HOFFMAN BROTHERS HARVESTING, INC.,
28 PAUL D. HOFFMAN & SONS, RONALD E.
HOFFMAN, and CARL R. HOFFMAN

1 Dated: March 26, 2021

Respectfully Submitted,
COLE HUBER LLP

2
3 /s/ *Derek P. Cole*
(as authorized on March 26, 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

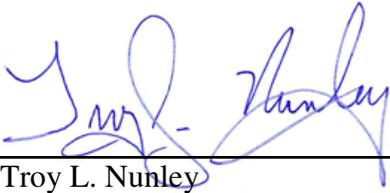
10
11 **ORDER**

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 April 15, 2021, shall be CONTINUED to April 29, 2021, at 2:00 p.m.

15 IT IS SO ORDERED.

16 Dated: March 31, 2021

17 
18 _____

Troy L. Nunley
United States District Judge