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 9 IN THE UNITED STATES DISTRICT COURT
 10 FOR THE EASTERN DISTRICT OF CALIFORNIA
 11 SACRAMENTO DIVISION

13 **JANE DOE #1,**

14 Plaintiff,

15 v.

16 **MARCUS JOHNSON, et al.,**

17 Defendants.

2:24-cv-1542 DJC AC P

STIPULATION TO EXTEND TIME FOR DEFENDANTS GONZALEZ, MACOMBER, AND MONTES TO RESPOND TO PLAINTIFF'S SECOND AMENDED COMPLAINT

~~PROPOSED~~ ORDER

18 Judge: Honorable Allison Claire
 19 Trial Date: None set
 Action Filed: May 31, 2024

20 **STIPULATION**

21 Pursuant to Federal Rule of Civil Procedure 6(b), the parties, by and through their attorneys
 22 of record, stipulate as follows:

23 1. Plaintiff Jane Doe #1 filed her operative Second Amended Complaint on November
 24 21, 2024 (ECF No. 27).

25 2. On December 6, 2024, the Court issued its screening order regarding the Second
 26 Amended Complaint and ordered Defendants L. Gonzalez, J. Macomber, and R. Montes

1 (Defendants)¹ to respond to the Second Amended Complaint within 21 days of the filing of the
2 order, making Defendants' initial deadline December 27, 2024 (ECF No. 28).

3 3. On December 26, 2024, the Court granted the parties' stipulated request to extend the
4 time for Defendants to respond to the Second Amended Complaint until January 24, 2025. (ECF
5 No. 31).

6 4. Since that extension, the parties have met and conferred regarding the claims and
7 allegations in Plaintiff's Second Amended Complaint and grounds for a motion to dismiss by
8 Defendants, including but not limited to, a challenge to Plaintiff's standing to pursue injunctive
9 relief and whether Plaintiff complied with the California Government Claims Act. Specifically,
10 Defendants' counsel prepared and sent a letter to Plaintiff's counsel on January 17, 2025,
11 outlining arguments for dismissal and the parties then conferred via video-conference on these
12 grounds on January 22, 2025. In addition, the parties are currently considering whether to pursue
13 early ADR, and Defendants have agreed to provide some documents under a protective order to
14 Plaintiff so that the parties may more fully evaluate Plaintiff's claims. Accordingly, additional
15 time to respond to the operative complaint is warranted to allow this exchange of information,
16 including the preparation and entry of a protective order; for additional discussion of the viability
17 of Plaintiff's claims against Defendants; and for the parties to more fully consider whether early
18 ADR is appropriate for this matter.

19 5. In addition, Defendants' counsel has been occupied with other matters. Mr. Mark
20 was out of the office from December 30, 2024 to January 10, 2025. During Mr. Mark's absence,
21 Mr. Glantz was required to work on other pressing matters, including reviewing and responding
22 to seven motions for remand in seven separate matters. And Mr. Glantz has been working to
23 respond to an administrative subpoena in a matter involving the United States Department of
24 Justice, which response is currently due January 24, 2025.

25 6. The parties have conferred and agree that additional time to respond to the Second
26 Amended Complaint until February 28, 2025, will allow the parties time to exchange documents,
27

28 _____
¹ The undersigned counsel does not represent Defendant Johnson.

1 conduct additional investigation concerning Plaintiff's claims, meet and confer further regarding
2 Plaintiff's claims, and consider whether early ADR is appropriate for this matter.

3 7. Accordingly, the parties stipulate and respectfully request that Defendants L.
4 Gonzalez, J. Macomber, and R. Montes shall have up to and including February 28, 2025 to
5 respond to the Second Amended Complaint.

6 **IT IS SO STIPULATED.**

7
8 Dated: January 24, 2025

/s/ Jenny C. Huang
(as authorized January 24, 2025)
Jenny C. Huang
Attorney for Plaintiff, Jane Doe #1

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10
11 Dated: January 24, 2025

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ALICIA A. BOWER
Supervising Deputy Attorney General
ZACHARY GLANTZ
Deputy Attorney General

/s/ Arthur B. Mark III

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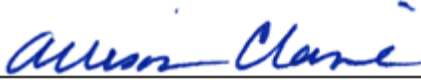
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~~PROPOSED~~ ORDER

Good cause appearing, the parties' stipulation is **GRANTED**. The deadline for Defendants Gonzalez, Macomber, and Montes to respond to Plaintiff's Second Amended Complaint is hereby extended up to and including February 28, 2025.

IT IS SO ORDERED.

DATED: January 24, 2025



ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE