

1 ROB BONTA, State Bar No. 202668
 Attorney General of California
 2 ALICIA A. BOWER, State Bar No. 287799
 Supervising Deputy Attorney General
 3 ARTHUR B. MARK III, State Bar No. 220865
 Deputy Attorney General
 4 1300 I Street, Suite 125
 P.O. Box 944255
 5 Sacramento, CA 94244-2550
 Telephone: (916) 210-7345
 6 Fax: (916) 324-5205
 E-mail: Arthur.Mark@doj.ca.gov
 7 *Attorneys for Defendants*
J. Macomber, L. Gonzalez and R. Montes

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

13 **JANE DOE #2,**
 14 Plaintiff,
 15 v.
 16 **MARCUS JOHNSON, et al.,**
 17 Defendants.
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 19
 20

2:24-cv-1844 DJC AC P

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

~~**PROPOSED**~~ **ORDER**

Judge: Hon. Allison Claire
 Trial Date: None set
 Action Filed: July 1, 2024

21 **STIPULATION**

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

- 24 1. Plaintiff Jane Doe #2 filed her operative First Amended Complaint on November 21,
 25 2024 (ECF No. 20).
 26 2. On December 6, 2024, the Court issued its screening order regarding the Second
 27 Amended Complaint and ordered Defendants L. Gonzalez, J. Macomber, and R. Montes
 28

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

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. 24).

6 4. Since that extension, the parties have met and conferred regarding the claims and
7 allegations in Plaintiff's First 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 First
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 First Amended Complaint.

6 **IT IS SO STIPULATED.**

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Dated: January 24, 2025

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

Dated: January 24, 2025

ROB BONTA
Attorney General of California
ALICIA A. BOWER
Supervising Deputy Attorney General
ZACHARY GLANTZ
Deputy Attorney General

/s/ Arthur B. Mark III
ARTHUR B. MARK III
Deputy Attorney General
Attorneys for Defendants L. Gonzalez, J. Macomber, and R. Montes

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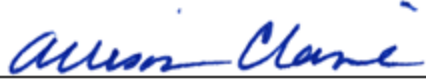
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~~PROPOSED~~ ORDER

Good cause appearing, the parties' stipulation is **GRANTED**. The deadline for Defendants Gonzalez, Macomber, and Montes to respond to Plaintiff's First 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