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Attorneys for Defendant  
ALAMEDA COUNTY

IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

SHAWNA WILKINS-JONES, CASE NO. C08-01485-MHP

Plaintiff,

v.

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND FILING  
DEADLINES**

COUNTY OF ALAMEDA, and  
DOES 1-10, Inclusive,

Defendants.

1 **STIPULATION**

2 Plaintiff SHAWNA WILKINS-JONES and Defendant COUNTY  
3 OF ALAMEDA hereby jointly stipulate and request through their attorneys of  
4 record as follows:

5 Plaintiff filed a Motion to Strike evidence submitted in support of  
6 defendant's Motion for Summary Judgement, on August 16, 2010. Docket  
7 # 128. Hearing on this Motion to Strike is September 20, 2010. Defendant filed  
8 its Opposition to the motion on August 30, 2010. Docket #147. The parties  
9 calculate that plaintiff's Reply to that motion is due September 6, 2010.

10 Plaintiff filed a Motion to Strike evidence submitted in support of  
11 defendant's Opposition to Plaintiff's Motion for Summary Judgment, on  
12 August 27, 2010, Docket # 136. Defendant has not yet filed its opposition.  
13 Hearing on this Motion to Strike is September 20, 2010, as well.

14 The parties hereby request that Defendant's Opposition to plaintiff's  
15 second Motion to Strike be due September 3, 2010, and that both plaintiff's  
16 Replies to both Oppositions to the Motions to Strike be due on September 10,  
17 2010.

18 Good cause exists to extend these deadlines because, among other  
19 reasons, plaintiff's counsel Cat Cabalo and plaintiff's paralegal, Aaron Clefton,  
20 who prepared the Motions to Strike, are both on vacation until September 6,  
21 2010. It would be difficult for another attorney to review the work they have  
22 completed in order to draft the Reply. It would cause duplication of research and  
23 effort, and therefore an unnecessary increase in attorney fees.

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25 **IT IS SO STIPULATED.**

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1 Dated: September 1, 2010

LAW OFFICES OF PAUL L. REIN

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/s/  
By: CELIA McGUINNESS  
Attorneys for Plaintiff  
SHAUNA WILKINS-JONES

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6 Dated: September 1, 2010

PORTER SCOTT

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/s/  
By: KEVIN KREUTZ  
Attorneys for Defendant  
COUNTY OF ALAMEDA

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**ORDER**

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Good cause having been shown, the Court grants the parties' stipulation. Defendant's Opposition to plaintiff's second Motion to Strike shall be filed no later than September 3, 2010; plaintiff's Replies to both Oppositions to the Motions to Strike shall be filed no later than September 10, 2010.

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*The Hearing may be rescheduled by the court depending on the parties' submissions.*  
**IT IS SO ORDERED.**

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Dated: September 2, 2010

  
Hon. MARILYN HALL PATEL  
United States District Judge

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