1 2 3 4	CELIA McGUINNESS, Esq. (SBN CATHERINE M. CABALO, Esq. (S LAW OFFICES OF PAUL L. REIN 200 Lakeside Dr., Suite A Oakland, CA 94612	159420) BBN 248198)
5 6 7	GEARINGER LAW GROUP 825 Van Ness Ave., 4 th Floor San Francisco, CA 94109-7891	46125)
8 9 10 11 12 13 14 15 16 17 18	RICHARD E. WINNIE (SBN 68048 County Counsel MARY ELLYN GORMLEY (SBN Assistant County Counsel TODD BOLEY (SBN 68119) Deputy County Counsel OFFICE OF THE COUNTY COUN 1221 Oak Street, Suite 450 Oakland, CA 94612 Telephone: (510) 272-6700 STEPHEN E. HORAN (SBN 12524 KEVIN M. KREUTZ (SBN 264654) PORTER SCOTT 350 University Avenue, Suite 200 Sacramento, CA 95825 Telephone: (916) 929-1481 Attorneys for Defendant County of A	SEL, COUNTY OF ALAMEDA 1)
192021	IN THE UNITED S IN AND FOR THE NORTH	TATES DISTRICT COURT IERN DISTRICT OF CALIFORNIA
22	SHAWNA WILKINS-JONES, C	CASE NO. C08-01485-MHP
23	Plaintiff,	
24	v. S	TIPULATION AND PROPOSED ORDER REQUESTING CONTINUATION OF CASE MANAGEMENT
25 26	COUNTY OF ALAMEDA, and	OF CASE MANAGEMENT CONFERENCE
27	Defendants.	
28	/	

LAW OFFICES OF **PAUL L. REIN** 200 LAKESIDE DR., SUITE A OAKLAND, CA 94612-3503 (510) 832-5001

 $S: CASES \\ A A LA~CTY~-~JONES \\ PLEADINGS \\ Stipulation~Requesting~Continuation~CMC.wpd$

STIPULATION

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

On February 10, 2011, the Court ordered a Case Management Conference for March 14, 2011.

Plaintiff's counsel have previously scheduled to be out of state on March 14, 2011. Defendant Alameda County Counsel is unavailable March 17, 2011, through March 29, 2011. Plaintiff's lead Counsel Celia McGuinness filed her notice of unavailability of counsel on February 10, 2011. She will be unavailable for the month of April, however, she will make herself available on April 4, 2011, if that date is available on the Court's calendar.

The parties therefore jointly stipulate and request that the Court reschedule the Case Management Conference to April 4, 2011, with a joint Case Management Conference Statement due March 30, 2011. If April 4, 2011, is not available on the Court's calendar, the parties jointly stipulate and request that the Court reschedule the Case Management Conference to a date in May, 2011.

18 19

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

IT IS SO STIPULATED.

20

21

Dated: February 14, 2011	LAW OFFICES OF PAUL L. REIN
• ,	GEARINGER LAW GROUP

2.2

/s/ Celia McGuinness 23 Attorneys for Plaintiff SHAWNA WILKINS-JONES 2.4

25

26

27

28

PAUL L. REIN 00 LAKESIDE DR., SUITE A nd, ca 94612-3503 (510) 832-5001

1	Dated: February 14, 2011 County Counsel in and for the County of Alameda, State of California	
2	Alameda, State of California	
3	By /s/ Todd Boley	
4	TODD BOLEY Deputy County Counsel Attorney for Defendant County of Alameda	
5	Dated: February 14, 2011 PORTER SCOTT	
6	Dated. Pediatry 14, 2011	
7	By /s/ Kevin Kreutz	
8	KEVIN M. KREUTZ Attorney for Defendant County of Alameda	
9	Theories for Berendant County of Francou	
10		
11	ORDER	
12	Good cause having been shown, the Court grants the parties'	
13	stipulation and request for a continuation of the Case Management Conference	
14	currently set for March 14, 2011. The Case Management Conference is now set	
15	for April 4, 2011, with a joint Case Management Conference Statement due	
16	March 30, 2011.*	
17	STATU	
18	IT IS SO ORDERED.	
19	[] a all left []	
20	Dated: 2/15, 2011	
21	United States District Judge	
22	DISTRICT	
23	* The Further Case Management Conference is continued to April 4, 2011 at 3:00 p.m., before the Honorable Marilyn Hall Patel. A supplemental joint case management	
24	conference statement shall be filed one week prior to the conference.	
25		
26		
27		

28