

E-Filed 12/2/11

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

JOSEPH C. HOWARD, JR. [SBN: 050784]
TODD H. MASTER [SBN: 185881]
MELISSA M. HOLMES [SBN: 220961]
HOWARD ROME MARTIN & RIDLEY LLP
1775 Woodside Road, Suite 200
Redwood City, CA 94061
Telephone: (650) 365-7715

Attorneys for Defendants CITY OF REDWOOD CITY;
JAIME MATEO; DAVID GOUGH; and RAMIRO PEREZ

MICHAEL J. HADDAD (State Bar No. 189114)
JULIA SHERWIN (State Bar No. 189268)
HADDAD & SHERWIN
505 Seventeenth Street
Oakland, California 94612
Telephone: (510) 452-5500
Fax: (510) 452-5510

Attorneys for Plaintiff
DOUGLAS BURNS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DOUGLAS BURNS, Individually,

Plaintiff,

vs.

CITY OF REDWOOD CITY, a public entity;
REDWOOD CITY POLICE DEPARTMENT;
POLICE OFFICER JAIME MATEO; POLICE
OFFICER DAVID GOUGH; POLICE OFFICER
RAMIRO PEREZ; POLICE OFFICER STEPHEN
SYSUM; POLICE OFFICER RICH
HARRINGTON, individually, and DOES 1-10,

Defendants.

Case No. C08-02995 RS

**STIPULATION AND ~~(PROPOSED)~~
ORDER TO EXTEND DEADLINE FOR
PLAINTIFF TO FILE MOTION FOR
REASONABLE ATTORNEYS FEES
AND COSTS**

JUDGE: Hon. Richard Seeborg

HOWARD ROME MARTIN & RIDLEY LLP
1775 WOODSIDE ROAD, SUITE 200
REDWOOD CITY, CALIFORNIA 94061
TELEPHONE (650) 365-7715

1 The parties, through their counsel have been engaged in settlement discussions to resolve
2 this entire matter without the need for Plaintiff to file a motion for reasonable fees and costs. The
3 parties need additional time to resolve this matter, hopefully without further Court intervention,
4 and therefore jointly request that this Court continue the deadline for the filing of Plaintiff's motion
5 for reasonable attorneys' fees and costs from December 13, 2011 to January 20, 2012.

6
7 DATE: December 1, 2011

8 HOWARD ROME MARTIN & RIDLEY LLP

9
10 By: /s/ Joseph C. Howard, Jr.
11 JOSEPH C. HOWARD, JR
12 Attorneys for Defendants CITY OF
13 REDWOOD CITY; JAIME MATEO;
14 DAVID GOUGH; and RAMIRO PEREZ

15 DATED: December 1, 2011

HADDAD & SHERWIN

16 By: /s/ Michael J. Haddad
17 MICHAEL J. HADDAD
18 Attorneys for Plaintiff
19 DOUGLAS BURNS

20 BY STIPULATION OF THE PARTIES, IT IS SO ORDERED.

21 DATED: 12/1/11

22 
23 _____
24 HON. RICHARD SEEBORG
25 UNITED STATES DISTRICT JUDGE
26