Case 3:08-cv-03194-JL Document 39 Filed 04/10/2009 Page 1 of 2 STEVEN M. WOODSIDE #58684 1 County Counsel ANNÉ L. KECK #136315 **Deputy County Counsel** 3 County of Sonoma 575 Administration Drive, Room 105A Santa Rosa, California 95403 4 Telephone: (707) 565-2421 5 Fax: (707) 565-2624 email: akeck@sonoma-county.org 6 Attorneys for Defendants County of Sonoma, Sonoma County 7 Sheriff's Department, and 8 William Cogbill, Sheriff 9 UNITED STATES DISTRICT COURT 10 FOR THE NORTHERN DISTRICT OF CALIFORNIA 11 SONOMA COUNTY LAW ENFORCEMENT) CASE NO.: 12 CV 08 3194 ASSOCIATION, et al., 13 STIPULATION TO CONTINUE Plaintiffs, 14 HEARING DATE ON DEFENDANTS' MOTION FOR JUDGMENT ON THE 15 PLEADINGS; (PROPOSED) ORDER v. COUNTY OF SONOMA, et al., 16 Next Hearing Date: April 29, 2009 Time: 9:30 AM F, 15th Floor 17 Defendants. Ctroom: 18 19 TO THE HONORABLE MAGISTRATE JUDGE JAMES LARSON: 20 21 Defendants respectfully request a continuance of the hearing on Defendants' 22 Motion for Judgment on the Pleadings in this matter, currently scheduled for April 29, 23 2009. Counsel for Plaintiffs has agreed and stipulated to this request, which is made on the following grounds. 24 25 1. On or about, March 4, 2009, Defendants filed a Motion for Judgment on the 26 Pleadings in this matter. The hearing on that motion was noticed for April 8, 2009. The parties have agreed to one extension previously, continuing the hearing until April 29, 27 2009. 28

1	2. Anne L. Keck, Deputy County Counsel, is the lead attorney for Defendants		
2	in this action, and is currently on family medical leave, and is therefore requesting a two		
3	week extension of time in which to reply to the opposition, and to continue the hearing		
4	date for two weeks.		
5	3. Gregory T. Dion, Chief Deputy County Counsel, consulted with Daniel T.		
6	McNamara, Attorney for Plaintiffs, who kindly indicated that he did not oppose		
7	7 continuing the hearing. Counsel for both parties are available on Ma	continuing the hearing. Counsel for both parties are available on May 13, 2009.	
8	4. Accordingly, Defendants request that their reply to the opposition in this		
9	9 matter be due no later than April 29, 2009, and that the Court contin	matter be due no later than April 29, 2009, and that the Court continue the hearing on	
10	Defendants' Motion for Judgment on the Pleadings to May 13, 2009	Defendants' Motion for Judgment on the Pleadings to May 13, 2009, at 9:30 a.m. in	
11	Courtroom F, 15 th Floor.		
12	IT IS SO STIPULATED.		
13	Dated: April 10, 2009 MASTAGNI, HOLSTEDT, MILLER, JOHNSEN & UH		
14		KHAWIVIEK	
15	By: <u>/S/ Daniel T. McNamara</u>	By: /S/ Daniel T. McNamara DANIEL T. MCNAMARA Attorneys for Plaintiffs	
16			
17	17 Dated: April 10, 2009 STEVEN M. WOODSIDE, COUNTY OF SONOMA	COUNTY COUNSEL	
18	By: /S/ Gregory T. Dion		
19			
20	GREGORY T. DION Attorneys for Defendants		
21		S	
22	22 * *	*	
23	ORDER		
24	24 IT IS SO ORDERED.		
25	25 Dated: 4/13/09	Lanon	
26	Batea:	RSON	
27		DISTRICT COURT	
28	28		