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7
8 UNITED STATES DISTRICT COURT

9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 ROSEMARY JENSEN AND RANDY
11 JENSEN,

No. CV 08 3440 JCS (BZ)

12 Plaintiffs,

**STIPULATION AND ORDER STAYING
 COURT PROCEEDINGS; ~~PROPOSED~~
 ORDER THEREON**

13 v.

14 COUNTY OF SONOMA,

15 Defendant.
 _____/

16 Defendant County of Sonoma and Plaintiffs Rosemary Jensen and Randy Jensen, having
 17 participated in the Mandatory Settlement Conference before Hon. Bernard Zimmerman, make the
 18 following stipulations and request an Order from the Court as follows:

19 1. The parties participated in good faith in the settlement conference on March 5, 2009, and
 20 have agreed to jointly seek a request that the Court stay the court proceedings as scheduled in this
 21 Court's Order of November 17, 2008, and specifically seek that the Court vacate that order and the
 22 following appearances and deadlines contained within that Order:

- 23 A. Trial date of August 31, 2009;
- 24 B. Discovery completion date of March 1, 2009;
- 25 C. Expert disclosures made by May 30, 2009;
- 26 D. Hearing on dispositive motions on May 1, 2009;
- 27 E. Pretrial Conference date of August 21, 2009.

2. The parties have agreed to continue the Mandatory Settlement Conference with Magistrate Zimmerman to **June 25, 2009 at 9:00 a.m.**, a date confirmed by Magistrate Zimmerman by order filed March 5, 2009;

3. The parties agree to stay all pending discovery (not to re-open discovery), including expert discovery;

4. The parties jointly request that a Case Management Conference with the Court be scheduled within 30 days after the continued settlement conference, the purpose of which would be to update the court with the parties' efforts at resolution and/or, alternatively, to obtain an updated pre-trial order from the Court. The parties would submit a Joint Case Management Conference statement 7 days' prior to the Case Management Conference.

DATED: March 13, 2009

SENNEFF FREEMAN & BLUESTONE, LLP

By: /s/ Bonnie A. Freeman-----
Bonnie A. Freeman
Attorneys for Defendant County of Sonoma

DATED: March 13, 2009

/s/ Frear Stephen Schmid-----
Frear Stephen Schmid, Attorney for Plaintiffs

ORDER

Good cause appearing, and pursuant to the stipulation above,

IT IS HEREBY ORDERED that the Court's Order of November 17, 2008, is hereby VACATED and the court proceedings and all discovery are stayed, pending the continued Mandatory Settlement Conference scheduled for June 25, 2009. In the event that a dismissal of the case is not filed following the settlement conference, the case will be set for further Case Management Conference/Trial Setting Conference on July 31, 2009. The parties shall submit a joint Case Management Statement 7 days prior to the conference.

DATED: March 16, 2009

JOSEPH C. Spero
United States District Court
Judge Joseph C. Spero

