

1 Bonnie A. Freeman, Esq. (SB 180502)  
 2 SENNEFF FREEMAN & BLUESTONE, LLP  
 3 50 Old Courthouse Square, Suite 401  
 4 P.O. Box 3729  
 5 Santa Rosa, CA 95402-3729  
 Telephone: 707-526-4250  
 Facsimile: 707-526-0347

6 Attorneys for Defendant County of Sonoma

7 UNITED STATES DISTRICT COURT

8 FOR THE NORTHERN DISTRICT OF CALIFORNIA

9 ROSEMARY JENSEN AND RANDY  
10 JENSEN,

No. CV 08 3440 JCS (BZ)

11 Plaintiffs,

12 **STIPULATION AND ORDER STAYING**  
 13 **COURT PROCEEDINGS AND**  
 14 **CONTINUING CASE MANAGEMENT**  
 15 **CONFERENCE OF 7/31/09; PROPOSED**  
 16 **ORDER THEREON**

17 v.

18 COUNTY OF SONOMA,

19 Defendant.

20 \_\_\_\_\_ /  
 21  
 22 Defendant County of Sonoma and Plaintiffs Rosemary Jensen and Randy Jensen, having  
 23 participated in the Mandatory Settlement Conference before Hon. Bernard Zimmerman, make the  
 24 following stipulations and request an Order from the Court as follows:

25 1. The parties participated in good faith in the settlement conference on March 5, 2009, and  
 26 met again for further settlement conference on June 18, 2009. As a result, the parties have agreed to  
 27 jointly seek a request that the Court continue to stay the court proceedings in light of the parties'  
 28 agreement to further continue the Mandatory Settlement Conference with Magistrate Zimmerman to  
**August 14, 2009 at 9:00 a.m.**, a date confirmed by Magistrate Zimmerman by order filed June 19, 2009;

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

3. The parties jointly request that the currently scheduled Case Management Conference of  
 July 31, 2009, at 1:30 p.m. be continued to a date within 30 days after the continued settlement

1 conference, the purpose of which would be to update the court with the parties' efforts at resolution  
2 and/or, alternatively, to obtain an updated pre-trial order from the Court. The parties would submit a Joint  
3 Case Management Conference statement 7 days' prior to the Case Management Conference.

4  
5 DATED: July 2, 2009 SENNEFF FREEMAN & BLUESTONE, LLP

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

9 DATED: July 2, 2009

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

10  
11 **ORDER**

12 Good cause appearing, and pursuant to the stipulation above,

13 IT IS HEREBY ORDERED that the court proceedings and all discovery are stayed, pending  
14 the continued Mandatory Settlement Conference scheduled for August 14, 2009. The currently  
15 scheduled Case Management Conference of July 31, 2009 is VACATED. In the event that a  
16 dismissal of the case is not filed following the continued settlement conference, the case will be set  
17 for further Case Management Conference/Trial Setting Conference on  
18 \_\_\_\_\_ September 18 \_\_\_\_\_, 2009. The parties shall submit a joint Case Management  
19 Statement 7 days prior to the conference.

20  
21 DATED: 7/9/09

22 JOSEPH C. SPERO  
United States District Court  
Northern District of California  
23  
24  
25  
26  
27  
28