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 DANIELLE POLLAR, SHALAWN POLLAR
 as Guardian Ad Litem for J.A., a minor

IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA

DANIELLE POLLAR, et al.,)	Case No. 08-04196 BZ
)	
Plaintiffs,)	
)	STIPULATION FOR AN
vs.)	ORDER TO EXTEND
)	BRIEFING DEADLINES
COUNTY OF ALAMEDA, et al.,)	
)	
Defendants.)	
_____)	

The parties hereto, by and through their respective counsel, do hereby stipulate and agree as set forth below on the following recital of facts and request this court order same:

1. The current deadline for Plaintiffs' Oppositions to the Amended Motions for Summary Judgment filed by the City Defendants (Docket #62) and County Defendants (Docket #66) is Friday, February 5, 2010, per Stipulation and Order (Docket #59).
2. Plaintiffs will file the Opposition to the City Defendants' Motion for Summary Judgment by the aforementioned deadline.

- 1 3. Plaintiffs' counsel will not be able to file Plaintiffs' Opposition to County
2 Defendants' Motion for Summary Judgment by the deadline, due to two
3 ongoing juvenile dependency trials, and a family law trial.
- 4 4. First, in the case of *Andrea N., Jady N., Ravyn N., Aaliyah K., Jasmine K.,*
5 *Gina K.*, Case #: 228331 through 228335, 228808, in Sacramento County
6 Superior Court, the trial has been spread out over several days, with numerous
7 delays and continuances, and has simply run longer than counsel originally
8 estimated.¹ The case has at least one days of trial remaining.
- 9 5. Second, in *Charley P., Kaylee R.*, Case # JD19508, JD19509, Plaintiffs'
10 counsel will be in trial at least half of the day on Tuesday, February 2, 2010, in
11 Santa Clara County Superior Court.
- 12 6. Third, in *Delfino v. Collins*, Case# 1-93 CP 001783, Plaintiffs' counsel will be
13 in trial on Friday, February 5, 2010, in Santa Clara County Superior Court.

14
15 BASED on the foregoing recitals, the parties stipulate and request the court order that:

- 16 1. The current deadline for Plaintiffs' Opposition to County Defendants' Motion for
17 Summary Judgment is hereby continued from Friday, February 5, 2010, to **Monday,**
18 **February 8, 2010.**
- 19 2. The current deadline for County Defendants' optional Reply brief is extended from
20 Friday, February 19, 2010, to **Monday, February 22, 2010.**
- 21
22
23
24
25

1 **IT IS SO STIPULATED.**

2 Dated: 2/2/10

3 /S/ Robert R. Powell
ROBERT R. POWELL, ESQ.
Attorney for Plaintiffs

4 Dated: 2/2/10

5 /S/ Rebecca Widen
REBECCA WIDEN, ESQ.
Attorney for County of Alameda, and
6 Individually Named Defendant
Employees of the County of Alameda

7 Dated: 2/2/10

8 /S/ Patrick Co
Patrick Co
Attorney for City of Hayward,
9 Sam Sander and Mike Edwards


10
11 **~~{PROPOSED}~~ ORDER**

12 Based on the foregoing stipulation, and good cause appearing therefore, the
13 Court hereby adopts the stipulation of the parties and orders as follows:

- 14 1. The current deadline for Plaintiffs' Opposition to County Defendants' Motion for
15 Summary Judgment is hereby continued from Friday, February 5, 2010, to **Monday,**
16 **February 8, 2010.**
- 17 2. The current deadline for County Defendants' optional Reply brief is extended from
18 Friday, February 19, 2010, to **Monday, February 22, 2010.**
- 19

20
21 **IT IS SO ORDERED.**

22 Dated: 2 / 2 / 3 /10

23 
JUDGE OF THE U.S. DISTRICT
COURT FOR THE NORTHERN
DISTRICT- SAN FRANCISCO

24
25 ¹ In juvenile dependency matters, it is common for the court to assign separate case numbers for each child in a family, though they are heard as one single case.