

E-Filed 5/11/10

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17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA
 19 SAN FRANCISCO DIVISION

20 COMMITTEE FOR IMMIGRANT
 RIGHTS OF SONOMA COUNTY, et al., No. CV-08-4220-RS

21 Plaintiffs,

22 v.

23 COUNTY OF SONOMA, et al.,

24 Defendants.

**STIPULATION TO: (1) EXTEND TIME
 WITHIN WHICH DEFENDANTS MUST
 FILE AN ANSWER TO SECOND
 AMENDED COMPLAINT; (2) EXTEND
 TIME TO FILE INTERLOCUTORY
 APPEAL; ~~PROPOSED~~ ORDER**

25 _____/
 26 The parties to this action, by and through their respective counsel of record, hereby enter the
 27 following stipulation and request entry of a conforming order. This stipulation and concomitant
 28 request for order is made based on Defendants' pending motions to reconsider the March 10, 2010

1 Order re Motions to Dismiss (Docket Numbers 174 and 177), which were heard by the Court and
2 taken under submission on May 6, 2010.

3 **STIPULATION**

4 1. Absent an intervening order, the time in which Defendants must file and serve their
5 answers to Plaintiffs' Second Amended Complaint (which date is currently set for May 10, 2010) shall
6 be extended to a date that is 10 days after entry of the Court's decision on the pending motions to
7 reconsider.

8 2. Absent an intervening order, the time in which the parties may file interlocutory
9 appeals of the March 10, 2010 Order re Motions to Dismiss, as provided in Federal Rule of Appellate
10 Procedure 4(a) or otherwise, is hereby extended for an additional 30 days, to June 8, 2010, pursuant to
11 Federal Rule of Appellate Procedure 4(a)(5). This stipulation and request for extension of the
12 appellate period set forth in the Federal Rules of Appellate Procedure does not prejudice or affect
13 other rights of the parties, including the ability of the parties to otherwise request or seek appellate
14 review, and is made in an abundance of caution to preserve their rights to appeal.

15 Respectfully submitted,

16 Dated: May 10, 2010

JOSEPH P. RUSSONIELLO
United States Attorney

17 By _____

18 /s/
Ila C. Deiss
Assistant United States Attorney
Attorneys for Defendants U.S. Department of
19 Homeland Security, Bureau of Immigration and
20 Customs Enforcement; Agent Mario Huelga; and
21 Special Agent Chris Merendino

22 Dated: May 10, 2010

JUAN OSUNA
Deputy Assistant Attorney General, Civil Division

23 By _____

24 /s/
Colin Kisor
Senior Litigation Counsel
25 United States Department of Justice
Office of Immigration Litigation
26 Attorneys for Defendant U.S. Department of
27 Homeland Security, Bureau of Immigration and
28 Customs Enforcement

1 Dated: May 10, 2010

Stephen M. Woodside, County Counsel

2

By _____/s/_____

3

Anne L. Keck, Deputy County Counsel
Sonoma County

4

BERTRAND, FOX & ELLIOT

Thomas F. Bertrand
Richard W. Osman

5

6

7

8 Dated: May 10, 2010

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Casey R. O'Connor

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12

By _____/s/_____

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13

14

Julia Harumi Mass
Alan L. Schlosser

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AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF NORTHERN
CALIFORNIA

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~~PROPOSED~~ ORDER

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Pursuant to stipulation, IT IS SO ORDERED.

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20 Date: 5/11/10

RICHARD SEEBORG
United States District Judge

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