

E-Filed 11/19/10

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17 Attorneys for Plaintiffs

18 UNITED STATES DISTRICT COURT
 19 NORTHERN DISTRICT OF CALIFORNIA
 20

21 COMMITTEE FOR IMMIGRANT RIGHTS OF
 SONOMA COUNTY, FRANCISCO SANCHEZ-
 LOPEZ, and CHRISTYAN SONATO-VEGA,

22 Plaintiffs,

23 v.

24 COUNTY OF SONOMA; SHERIFF-CORONER
 BILL COGBILL and DEPUTY SHERIFF MORRIS
 25 ERIC SALKIN, individually and in their official
 capacities; U.S. DEPARTMENT OF HOMELAND
 26 SECURITY, BUREAU OF IMMIGRATION AND
 CUSTOMS ENFORCEMENT; SPECIAL AGENT-
 27 IN-CHARGE MARK WOLLMAN, SPECIAL
 AGENT MARIO HUELGA and SPECIAL AGENT
 28 CHRIS MERENDINO, individually and in their
 official capacities; DOES 1-50; and ROES 1-50,

CASE NO. CV-08-04220-RS

**STIPULATION AND ~~PROPOSED~~
 ORDER TO CONTINUE HEARING
 DATE ON COUNTY DEFENDANTS'
 MOTION FOR JUDGMENT ON THE
 PLEADINGS AND FURTHER CASE
 MANAGEMENT CONFERENCE**

Judge: Hon. Richard Seeborg

1 inclusive,

2 Defendants.

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1 WHEREAS, the Court on October 22, 2010, ordered a further Case Management
2 Conference to be held on January 20, 2011, at 10:00 am in Courtroom 3, 17th Floor, United
3 States Courthouse, 450 Golden Gate Avenue, San Francisco, California, and for the parties to file
4 a Joint Case Management Statement at least one week prior to the Conference;

5 WHEREAS, on November 10, 2010, County Defendants the County of Sonoma, Sheriff-
6 Coroner William Cogbill, and Deputy Sheriff Morris Eric Salkin (“County Defendants”) filed a
7 Motion for Judgment on the Pleadings and noticed the hearing on the motion for December 16,
8 2010, at 1:30 p.m.;

9 WHEREAS, the deposition of Plaintiff Francisco Sanchez-Lopez is currently scheduled
10 for December 16, 2010, beginning at 9:00 a.m.;

11 WHEREAS, Plaintiffs have requested that the hearing date on County Defendants’
12 Motion for Judgment on the Pleadings be moved to another date, so as not to occur on the same
13 date as Plaintiff Sanchez-Lopez’s deposition, and County Defendants have agreed to continue
14 the hearing on that motion to January 27, 2011, at 1:30 p.m.;

15 WHEREAS, to conserve the resources of the parties, they also wish to move the Case
16 Management Conference from its current scheduling of January 20, 2011, at 10:00 a.m., to
17 January 27, 2011, at 1:30 p.m., to occur at the same time as the hearing on County Defendants’
18 Motion for Judgment on the Pleadings.

19 IT IS HEREBY STIPULATED AND AGREED by and among the parties, through their
20 respective undersigned counsel, as follows:

21 1. The parties respectfully request that the Court continue the hearing on County
22 Defendants’ Motion for Judgment on the Pleadings, from its current date of December 16, 2010,
23 to January 27, 2011, at 1:30 p.m.; and

24 2. The parties respectfully request that the Court continue the further Case
25 Management Conference, currently set for January 20, 2011, to January 27, 2011, at 1:30 p.m.,
26 with the parties to file a Joint Case Management Statement at least one week prior to the
27 Conference.
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1 Authority for and concurrence in the filing of this stipulated request has been obtained
2 from each of the signatories, pursuant to General Order 45(X)(B).
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4 Dated: November 18, 2010

Respectfully submitted,

LATHAM & WATKINS LLP

Alfred C. Pfeiffer
Hyun Jee Son
Mary Elizabeth-Heard
Megan Bouchier
Jason Daniels
Casey R. O'Connor
Robert Studley

10 By /s/ Hyun Jee Son
11 Hyun Jee Son

12 Julia Harumi Mass
13 Alan L. Schlosser
14 AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
NORTHERN CALIFORNIA

15 Attorneys for Plaintiffs

16
17 Dated: November 18, 2010

Respectfully submitted,

Stephen M. Woodside, County Counsel

19 By /s/ Anne Keck
20 Anne L. Keck, Deputy County Counsel
21 Sonoma County

22 Attorneys for Defendants COUNTY OF
23 SONOMA, SHERIFF-CORONER WILLIAM
COGBILL, and DEPUTY SHERIFF MORRIS
ERIC SALKIN

24
25 Dated: November 18, 2010

Respectfully submitted,

MELINDA HAAG
United States Attorney

27 By /s/ Ila Deiss
28 ILA DEISS

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Assistant United States Attorney
Attorney for Defendants SPECIAL AGENT
MARIO HUELGA and SPECIAL AGENT
CHRIS MERENDINO

Dated: November 18, 2010

Respectfully submitted,

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Director

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Assistant Director

By /s/ Colin Kisor
COLIN KISOR
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Attorneys for Defendants U.S. DEPARTMENT
OF HOMELAND SECURITY, BUREAU OF
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ORDER

IN LIGHT OF THE PARTIES' STIPULATION, IT IS HEREBY ORDERED

THAT:

1. The hearing on County Defendants' Motion for Judgment on the Pleadings shall be continued from December 16, 2010, to January 27, 2011, at 1:30 p.m.; and
2. The further Case Management Conference shall be continued from January 20, 2011, to January 27, 2011, at 1:30 pm, with the parties to file a Joint Case Management Statement at least one week prior to the Conference.

DATED: 11/19/10

By: 

THE HONORABLE RICHARD SEEBORG
United States District Judge