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14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA  
 16 SAN FRANCISCO DIVISION

18 COMMITTEE FOR IMMIGRANT RIGHTS  
 19 OF SONOMA COUNTY, et al.,

No. CV-08-4220-RS

20 Plaintiffs,

**JOINT STIPULATION TO EXTEND  
 TEMPORARY STAY OF ACTION;  
 [PROPOSED] ORDER**

21 v.

22 COUNTY OF SONOMA, et al.,

23 Defendants.

24 The parties herein, through their respective counsel of record, hereby agree and stipulate as  
 25 follows.

26 **RECITALS**

27 1. Pursuant to a stipulation of the parties, this Court entered an Order on December 22,  
 28 2010, vacating all dates previously ordered by the Court in this action (with the exception of the Case

1 Management Conference date) and staying this action through February 10, 2011. (Dkt. No. 247.)  
2 For the purposes of this stipulation, this stay shall be referred to herein as the “Temporary Stay.”

3 2. In the Temporary Stay Order, the Court also continued the Case Management  
4 Conference to March 17, 2011, at 10:00 a.m. (*Id.*). Pursuant to local rules, the parties’ Joint  
5 Supplemental Case Management Conference Statement is accordingly due to be filed on March 10,  
6 2011.

7 3. The parties had requested the Order approving the Temporary Stay pursuant to an  
8 agreement reached at the settlement conference held before Magistrate Judge Chen on December 14,  
9 2010, for the purpose of permitting the parties to pursue further settlement discussions without the  
10 necessity of attending to other litigation demands.

11 4 On January 20, 2011, Magistrate Judge Chen entered an Order setting a further  
12 settlement conference in this matter for March 4, 2011, at 9:30 a.m., and requiring the parties to lodge  
13 further settlement conference statements by February 18, 2011. (Dkt. No. 248.) For the purposes of  
14 this stipulation, such Order shall be referred to as the “Further Settlement Conference Order.”

15 5 The parties have not completed settlement discussions as of the date of this filing,  
16 which discussions remain ongoing.

### 17 **STIPULATION**

18 6. Based on the foregoing, the parties stipulate and request entry of an order extending  
19 the Temporary Stay of this action through and including March 16, 2011, with the exception of the  
20 following:

- 21 a. The Further Settlement Conference Order (Dkt. No. 248) shall remain in full  
22 force and effect; and  
23 b. The parties remain obliged to file their Supplemental Joint Case Management  
24 Conference Statement on March 10, 2011.

25 7. The further Case Management Conference shall remain set to occur on March 17,  
26 2011, at 10:00 a.m.

27 **IT IS SO STIPULATED.**

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Respectfully submitted,

Dated: February 9, 2011

BRUCE D. GOLDSTEIN  
County Counsel, County of Sonoma

By: /s/ Anne L. Keck  
Anne L. Keck  
Deputy County Counsel

Attorneys for Defendants the County of Sonoma,  
Sheriff-Coroner William Cogbill, and Deputy Sheriff  
Morris Eric Salkin

Dated: February 9, 2011

MELINDA HAAG  
United States Attorney

By: /s/ Ila C. Deiss  
Ila C. Deiss  
Assistant United States Attorney

Attorneys for Defendants U.S. Department of Homeland  
Security, Bureau of Immigration and Customs  
Enforcement; Special Agent Mario Huelga; and Special  
Agent Chris Merendino

Dated: February 9, 2011

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Deputy Assistant Attorney General, Civil Division

By: /s/ Colin Kisor  
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U.S. DOJ, Office of Immigration Litigation

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Security, Bureau of Immigration and Customs  
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Dated: February 9, 2011

LATHAM & WATKINS LLP

By: /s/ Robert Studley  
Alfred C. Pfeiffer, Jr.  
Robert Studley

Attorneys for Plaintiffs

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**[PROPOSED] ORDER**

Pursuant to the foregoing stipulation, and with good cause appearing, it is hereby ordered that this action shall remain temporarily stayed through and including March 16, 2011, with the exception of the following:

- a. The Further Settlement Conference Order (Dkt. No. 248) shall remain in full force and effect; and
- b. The parties remain obliged to file their Supplemental Joint Case Management Conference Statement on March 10, 2011.

The further Case Management Conference shall remain set to occur on March 17, 2011, at 10:00 a.m.

IT IS SO ORDERED.

Date: 2/9/11

  
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Honorable Richard Seeborg  
United States District Court Judge