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

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

20 Plaintiffs,

21 v.

22 COUNTY OF SONOMA, et al.,

23 Defendants.

**JOINT STIPULATION TO FURTHER  
 EXTEND TEMPORARY STAY OF  
 ACTION AND CONTINUE CASE  
 MANAGEMENT CONFERENCE;  
 [PROPOSED] ORDER**

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.” In  
3 the Temporary Stay Order, the Court also continued the Case Management Conference to March 17,  
4 2011, at 10:00 a.m. (*Id.*). The parties’ purpose in requesting the stay was to permit them to pursue  
5 further settlement discussions without the necessity of attending to other litigation demands.

6 2. On February 10, 2011, this Court approved the parties’ stipulation to extend the  
7 Temporary Stay through March 16, 2011, with identified exceptions, for the purpose of permitting  
8 them to continue their settlement discussions. (Dkt. No. 251.) Per that Order, the Case Management  
9 Conference date remained set for March 17, 2011.

10 3. On March 4, 2011, the parties participated in a further settlement conference before  
11 Magistrate Judge Chen. Discussions and issues raised at that conference require further consideration  
12 by the parties as part of the settlement process. Magistrate Judge Chen has indicated that he is open to  
13 assisting the parties further with their ongoing settlement process if needed.

14 4. Accordingly, the parties believe that it is in their and the Court’s best interests to  
15 further extend the Temporary Stay through April 15, 2011, to permit them to continue their settlement  
16 discussions unimpeded by other litigation demands. To this end, the parties also seek a continuance  
17 of the Case Management Conference, currently set for March 17, 2011, to May 26, 2011, or such  
18 other date that is convenient for the Court.

19 **STIPULATION**

20 5. Based on the foregoing, the parties stipulate and request entry of an order extending  
21 the Temporary Stay of this action through and including April 15, 2011, with the exception that  
22 Magistrate Judge Chen may enter orders regarding the settlement process during the period of the  
23 stay.

24 6. The parties further stipulate and request entry of an order continuing the Case  
25 Management Conference currently set for March 17, 2011, to May 26, 2011, at 10:00 a.m., or such  
26 other date and time as are convenient for the Court. The Joint Supplemental Case Management  
27 Statement is requested to be due one week prior to the conference.

28 **IT IS SO STIPULATED:**

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Respectfully submitted,

Dated: March 9, 2011

BRUCE D. GOLDSTEIN  
County Counsel, County of Sonoma

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

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

Dated: March 9, 2011

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and Special Agent Chris Merendino

Dated: March 9, 2011

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Dated: March 9, 2011

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~~[PROPOSED]~~ ORDER

Pursuant to the foregoing stipulation, and with good cause appearing, it is hereby ordered as follows:

- a. This action shall remain temporarily stayed through and including April 15, 2011, with the exception that Magistrate Judge Chen may enter orders regarding the settlement process during the period of the stay.
- b. The Case Management Conference currently set for March 17, 2011, shall be continued to May 26, 2011, at 10:00 a.m., and the Joint Supplemental Case Management Conference Statement is due to be filed one week prior.

IT IS SO ORDERED.

Date: 3/9/11



Honorable Richard Seeborg  
United States District Court Judge