1 LAW OFFICES OF PANOS LAGOS Panos Lagos, Esq. / SBN 61821 2 5032 Woodminster Lane Oakland, CA 94602 3 (510)530-4078 (510)530-4725/FAX 4 panoslagos@aol.com 5 Attorney for Plaintiffs, FREDERICK JACKSON; A. JACKSON, a Minor; B. JACKSON, a Minor; SHAWNA 6 YVETTE MARTIN 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 FREDERICK JACKSON; Case No.: C 09-01016 WHA A. JACKSON, a Minor; 11 B. JACKSON, a Minor; SHAWNA YVETTE MARTIN, STIPULATION AND PROPOSED 12 ORDER TO CONTINUE MOTION Plaintiffs. FOR SANCTIONS (FRCP 11(b)) 13 14 CITY OF PITTSBURG; AARON L. BAKER, 15 individually and in his Official Capacity as CHIEF OF POLICE OF THE CITY OF PITTSBURG POLICE DEPARTMENT; 16 G. LOMBARDI, individually and as an Officer of the CITY OF PITTSBURG POLICE 17 DEPARTMENT (BADGE #275); C. SMITH, 18 individually and as an Officer of the CITY OF PITTSBURG POLICE DEPARTMENT (BADGE 19 #285); P. DUMPA, individually and as an Officer of the CITY OF PITTSBURG POLICE DEPARTMENT (BADGE #291); WILLIAM BLAKE HATCHER, individually and as an Officer of the CITY OF PITTSBURG POLICE 20 21 DEPARTMENT (BADGE #274); SARA SPIRES, 22 individually and as an Officer of the CITY OF PITTSBURG POLICE DEPARTMENT; and 23 DOES 1 - 100, inclusive, 24 Defendants. 25 IT IS HEREBY STIPULATED by and between Plaintiffs' attorney, Panos Lagos, Esq. of 26 27 the Law Offices of Panos Lagos and Defendants' attorney, Owen T. Rooney, Esq. of Edrington 28 Schirmer & Murphy, that Plaintiffs' Motion for Sanctions pursuant to FRCP 11(b) shall be heard

STIPULATION AND TROPESED ORDER TO CONTINUE MOTION FOR SANCTIONS

- 1 -

on July 8, 2010. The reasons for such request are as follows:

- 1. Plaintiffs did not provide proper statutory notice of the June 17, 2010 hearing date;
- 2. The parties stipulated to continuing hearing on the motion to July 1, 2010;
- The Court has advised that the Honorable William H. Alsup is unavailable on July 1,
   2010 and that the next available hearing date is July 8, 2010.

It is further stipulated that this Stipulation may be executed in counterpart and the separate signatures treated as one document through incorporation by reference and that any facsimile signatures of counsel on the Stipulation may be treated as the original execution of the Stipulation by that counsel/party.

Dated: June 4, 2010

LAW OFFICES OF PANOS LAGOS

Panos Lagos, Esq.
Attorneys for Plaintiffs,

FREDERICK JACKSON; et al.

Dated: June <u></u>, 2010

EDRINGTON, SCHIRMER & MURPHY

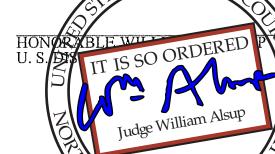
Owen T. Rooney, Esq. Attorneys for Defendants, CITY OF PITTSBURG; et al.

## **ORDER**

IT IS HEREBY ORDERED that the Motion for Sanctions filed by Plaintiffs shall be

heard on July 8, 2010 at 8:00 a.m. in Courtroom 9, 19th Floor.

June 14, 2010.



STIPULATION AND PROPOSED ORDER TO CONTINUE MOTION FOR SANG

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28