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10 Attorney(s) for the County of Marin,  
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12 **UNITED STATES DISTRICT COURT**  
 13 **NORTHERN DISTRICT OF CALIFORNIA**  
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 16 SIMONE RIVERS,

17 Plaintiff,

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 19 v.

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 21 COUNTY OF MARIN; WILLIAM BURKE;  
 22 MICHAEL DALY; TERRI HAMPTON; and  
 DOES 1 through 50, inclusive,

23 Defendants.  
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**Case No. USDC 09 1614 EMC**

STIPULATION AND PROPOSED ORDER  
 REGARDING CASE MANAGEMENT  
 CONFERENCE AND DEADLINES

1. WHEREAS, the parties have entered into a settlement agreement that needs to be memorialized in writing, and the parties have several post-agreement issues to resolve;

2. WHEREAS, the parties have various discovery items scheduled in the next few weeks because the final date for non-expert discovery is approaching;

3. WHEREAS, the parties and the Court have a Case Management Conference scheduled for April 21, 2010, and the Court's clerk has requested the parties provide a written stipulation to move the Case Management Conference;

IT IS HEREBY STIPULATED by and between the parties that:

1. The Case Management Conference on April 21, 2010 is vacated;

2. All court-ordered deadlines in the case, including discovery cutoffs, the pretrial conference, and the trial date be vacated;

3. A further Case Management Conference should be scheduled for June 2, 2010 regarding the status of the dismissal; and

4. The further Case Management Conference of June 2, 2010 will be vacated upon filing of a dismissal of all Defendants.

Dated: April 20, 2010

KAHN, BROWN & POORE

BY: \_\_\_\_\_/s/\_\_\_\_\_

DAVID POORE

Attorney for Plaintiff

Dated: April 20, 2010

PATRICK K. FAULKNER  
MARIN COUNTY COUNSEL

BY: \_\_\_\_\_/s/\_\_\_\_\_

STEPHEN RAAB

Attorneys for Defendant County of Marin

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PROPOSED ORDER

THE COURT HEREBY ORDERS AS FOLLOWS:

The Case Management Conference set for April 21, 2010 is hereby vacated. All court-ordered deadlines in the case, including discovery cutoffs, the pretrial conference, and the trial date is hereby vacated. A further Case Management Conference is ordered for June 2, 2010 regarding the status of the dismissal. The further Case Management Conference of June 2, 2010 will be vacated upon filing of a dismissal of all Defendants. An updated CMC statement shall be filed by May 26, 2010.

DATED: 4/20/10

Edward M. Chen  
Magistrate

