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10 Attorneys for Plaintiff
 11 SIMONE RIVERS

12 UNITED STATES DISTRICT COURT
 13 FOR THE NORTHERN DISTRICT OF CALIFORNIA

15 SIMONE RIVERS;

17 Plaintiff,

18 v.

19 COUNTY OF MARIN; WILLIAM BURKE
 MICHAEL DALY; TERRI HAMPTON; and
 20 DOES 1 through 50,

21 Defendants.

Case No.: USDC 09 1614 EMC

STIPULATION AND PROPOSED ORDER
 TO FILE AND SERVE FIRST AMENDED
 COMPLAINT RESETTING CMC

23
 24 IT IS HEREBY STIPULATED by and between the parties to continue the Case Management
 25 Conference, which is presently set for July 14, 2010, at 2:30 p.m., for 30 days to allow the parties to
 26 finalize the settlement. There is good cause in which to grant this request as the Marin County Board of
 27 Supervisors has now approved the settlement and the parties are working on finalizing the further
 28 written settlement agreement and release. This case is slightly more complicated that other cases in

STIPULATION AND PROPOSED ORDER TO CONTINUE THE CMC
 RIVERS v. COUNTY OF MARIN ET AL, CASE NO. C09-1614 EMC

1 which the consideration is monetary. This case involves complex issues of retirement, COBRA
2 benefits, and other non-monetary relief. .

3
4 SO STIPULATED.

5
6 Dated: 07/12/10

KAHN, BROWN & POORE LLP

7
8 BY: /s/ David M. Poore

9 DAVID POORE
Attorney for Plaintiff

10
11 Dated: 07/12/10

PATRICK K. FAULKNER
MARIN COUNTY COUNSEL

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13
14 BY: /s/ Stephen Raab

15 STEPHEN RAAB
Attorney for Defendant County of Marin

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17
18 ~~PROPOSED ORDER~~

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20 THE COURT HEREBY ORDERS AS FOLLOWS:

21 The parties' stipulation and proposed order to continue the CMC is approved and Granted. The parties
22 are ordered to appear on August 11, 2010, at 2:30 p.m., for a further CMC to confirm settlement.

23 An updated joint cmc statement shall be filed by August 4, 2010.

24
25 DATED: 7/13/10

HON. EDWARD M. CHEN
JUDGE

