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8 Attorneys for Defendants
 9 COUNTY OF SANTA CLARA, SUSAN
 10 WARE, KAREN HEGGIE, DONALD
 11 GAGE, LIZ KNISS, MICHAEL ROSSI,
 12 FRAN ALLEN, JONATHAN
 13 WEINBERG, WILL LIGHTBOURNE,
 14 KATHLEEN MILES, IZI CHAN,
 15 PATRICIA GEISICK (ALSO SUED
 16 ERRONEOUSLY HEREIN AS "SANTA
 17 CLARA COUNTY DEPARTMENT OF
 18 SOCIAL SERVICES" AND
 19 "DEPARTMENT OF FAMILIES AND
 20 CHILDREN SERVICES AGENCY")



21 UNITED STATES DISTRICT COURT
 22 NORTHERN DISTRICT OF CALIFORNIA
 (San Francisco)

17	MEAGAN BUCKHOLTZ, Personally,)	No. C09-06037 SI
18	Plaintiff,)	SUPPLEMENTAL CASE MANAGEMENT STATEMENT AND [PROPOSED] ORDER CONTINUING CASE MANAGEMENT CONFERENCE
19	v.)	
20	SANTA CLARA COUNTY, et al.)	
21	Defendants.)	Date: May 6, 2011
22)	Time: 3:00 p.m.
)	Dept.: Crtrm 10, 19 th Floor
)	Judge: Judge Susan Illston

23 Pursuant to Civil L.R. 16-10(d), the parties to the above-entitled action certify that they
 24 met and conferred prior to the subsequent case management conference scheduled in this case
 25 and jointly submit this Supplemental Case Management Statement and Proposed Order
 26 Continuing Case Management Conference and request the Court to adopt it as a Supplemental
 27 Case Management Order in this case.

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DESCRIPTION OF SUBSEQUENT CASE DEVELOPMENTS

The following progress or changes have occurred since the last case management statement filed by the parties, and necessitate a further continuance of the currently scheduled conference:

1. This Court continued the prior Case Management Conference because there were delays in the Santa Clara County Superior Court’s release of Plaintiff’s Child Dependency records pursuant to Defendants’ Welfare & Institutions Code §827 petition.

On or about January 24, 2011, the Superior Court did release some, but not all, categories of the requested records. As a result, Defendants were required to submit a second Welfare & Institutions Code §827 petition for the missing records on or about February 11, 2011.

Earlier this week, counsel for Defendants learned from the Superior Court that the records responsive to the second petition will not be ready for release for another three to four weeks.

The parties respectfully request that the Subsequent Case Management Conference be continued approximately 90 days for the following reasons:

A. Plaintiff’s Child Dependency records are necessary for Defendants to prepare for the deposition of Plaintiff and to then present, and for Plaintiff to oppose, a summary judgment motion;

B. The parties will require time to review and analyze the second set of released Child Dependency records to determine if they are fully responsive to the Welfare & Institutions Code §827 petition, or whether a further petition will be needed.

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1 2. The parties jointly request the Court to make the following Supplemental Case
2 Management Order:

3 The subsequent case management conference scheduled for 3:00 pm on May 6, 2011, in
4 Courtroom 10 be continued to 3:00 pm on August 5, 2011, in Courtroom 10.

5 I hereby attest that I have on file the holograph signature indicated by a “conformed”
6 signature (/S/) within this e-filed document.

7 Dated: April 28, 2011

Respectfully submitted,
MIGUEL MÁRQUEZ
County Counsel

9 By: /S/
10 MARK F. BERNAL
 Deputy County Counsel

11 Attorneys for Defendant
12 COUNTY OF SANTA CLARA,
13 SUSAN WARE, KAREN HEGGIE,
14 DONALD GAGE, LIZ KNISS,
15 MICHAEL ROSSI, FRAN ALLEN,
16 JONATHAN WEINBERG, WILL
17 LIGHTBOURNE, KATHLEEN MILES,
18 IZI CHAN, PATRICIA GEISICK (ALSO
19 SUED ERRONEOUSLY HEREIN AS
20 “SANTA CLARA COUNTY DEPARTMENT
21 OF SOCIAL SERVICES” AND
22 “DEPARTMENT OF FAMILIES AND
23 CHILDREN SERVICES AGENCY”)

19 Dated: April 28, 2011


By: /S/
MEAGAN BUCKHOLTZ
Plaintiff in Pro Se

[Proposed]
ORDER

23 The subsequent case management conference scheduled for 3:00 pm on May 6, 2011, in
24 Courtroom 10 is continued to 3:00 pm on August ~~5~~⁷, 2011, in Courtroom 10.

25 IT IS SO ORDERED.

26
27 Dated: 5/2/11
28 _____



Honorable Susan Illston
United States District Court Judge