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5 Attorneys for Defendants
 6 COUNTY OF SANTA CLARA (ALSO
 7 SUED ERRONEOUSLY HEREIN AS
 8 "SANTA CLARA COUNTY
 9 DEPARTMENT OF SOCIAL
 10 SERVICES" AND "DEPARTMENT OF
 11 FAMILIES AND CHILDREN SERVICES
 12 AGENCY"), SUSAN WARE, KAREN
 HEGGIE, DONALD GAGE, LIZ KNISS,
 MICHAEL ROSSI, FRAN ALLEN,
 JONATHAN WEINBERG, WILL
 LIGHTBOURNE, KATHLEEN MILES,
 IZI CHAN, PATRICIA GEISICK, KEN
 BORELLI, AND JEAN PLATNER

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 (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: November 4, 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 in the above-entitled action certify that they
 24 did meet and confer prior to the subsequent case management conference scheduled in this case.
 25 The Parties jointly submit this Supplemental Case Management Statement and Proposed Order
 26 **Continuing Case Management Conference** and request the Court to adopt it as a
 27 Supplemental 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 Conferences because there were delays in the Santa Clara County Superior Court’s release of Plaintiff’s Child Dependency records pursuant to multiple Welfare & Institutions Code §827 petitions. Once those records were produced, the Court continued the case management conference to allow the parties time to review those voluminous records, depose Plaintiff, and complete summary judgment briefing.

2. *Pro Se* Plaintiff’s school and work schedules limited her availability for deposition. On October 3, 2011, the County noticed Plaintiff’s deposition for October 28, 2011. On October 25, 2011, Plaintiff informed the County that she retained an attorney to represent her for purposes of the deposition *only* who was not available on October 28, 2011. As a result of further meet and confer efforts and accommodations to the new attorney’s trial schedule, the County agreed to re-notice the deposition for November 22, 2011. This will delay summary judgment efforts and realistically places the completion of briefing into early 2012.

3. The Parties respectfully request that the Subsequent Case Management Conference be continued approximately 90 days to allow the parties to complete Plaintiff’s deposition and brief the summary judgment motion. It is anticipated that the briefing can be completed within that time period.

The Parties respectfully request the Court to make the following Supplemental Case Management Order:

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