

E-Filed 2/16/11

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 8 Cogbill, and County employees Michael
 Shanahan, Caroline Japp, Jo Weber,
 9 and Robin Smith

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION

13 SALLY STEINHART,
 14 Plaintiff,

No. CV-10-00841 RS

15 v.

16 COUNTY OF SONOMA, SHERIFF-CORONER
 BILL COGBILL and DEPUTY SHERIFFS M.
 17 SHANAHAN and CAROLYN JAAP; HUMAN
 SERVICES DEPARTMENT DIRECTOR JO
 18 WEBER; FAMILY, YOUTH & CHILDREN'S
 SERVICES DIVISION DIRECTOR CAROL
 19 BAUER; YOUTH & CHILDREN'S SERVICES
 DIVISION DIRECTOR NICHOLAS HONEY;
 20 CHILD WELFARE SERVICES/ PROTECTIVE
 SERVICES SOCIAL WORKERS JERRY ALLEN,
 21 BETTY JOHNSON, and ROBIN SMITH,
 individually and in their official capacities,
 22 CALIFORNIA DEPARTMENT OF SOCIAL
 SERVICES; DOES 1-50, and ROES 1-50, and
 23 MOES 1-50, inclusive, jointly and severally,

**STIPULATION TO CONTINUE CASE
 MANAGEMENT CONFERENCE SET
 FOR FEBRUARY 24, 2011, AND TO
 EXTEND TIME TO RESPOND TO
 AMENDED COMPLAINT;
 [PROPOSED] ORDER
 AS MODIFIED BY THE COURT**

24 Defendants.
 _____/

26 This joint stipulation and request for entry of an order continuing the Case Management
 27 Conference and extending the time to respond to an amended complaint is entered into by and

1 between Plaintiff in pro per, Sally Steinhart (“Plaintiff”), and Defendants the County of Sonoma,
2 Sheriff-Coroner William Cogbill, and County employees Michael Shanahan, Caroline Jaap, Jo
3 Weber, Nicholas Honey, Jerry Allen, Betty Johnson and Robin Smith (collectively, “County
4 Defendants”). By this stipulation, these parties request that the Case Management Conference
5 currently scheduled for February 24, 2011, be continued to April 28, 2011 (or such other date as is
6 convenient for the Court), to permit the filing of a second amended complaint and response thereto
7 prior to such conference. Defendant the State Department of Social Services and other named
8 defendants have not appeared in this action, and are not parties to this stipulation.

9 **RECITALS**

10 A. Plaintiff initiated this action on February 26, 2010, and filed her First Amended
11 Complaint on June 21, 2010 (Dkt. No. 8). County Defendants responded by filing their Motion to
12 Dismiss the First Amended Complaint and Motion for More Definite Statement on July 26, 2010
13 (Dkt. No. 12) (hereinafter, the “Motions”).

14 B. The Court resolved the County Defendants’ Motions on February 7, 2011, through its
15 Order Granting in Part and Denying in Part Motion to Dismiss and Denying Motion for a More
16 Definite Statement (Dkt. No. 34) (hereinafter, the “Order”). Pursuant to such Order, Plaintiff is
17 required to submit any amended pleading within 30 days of the date of entry of the Order (i.e.,
18 through March 9, 2011).

19 C. Pursuant to previous stipulation and order, the time in which County Defendants may
20 file and serve an Anti-SLAPP Motion under California Code of Civil Procedure Section 425.16 has
21 been extended through April 4, 2011 (Dkt. No. 33).

22 D. In addition, Plaintiff has consented to County Defendants’ request for an extension of
23 time to file their responsive pleading to that portion of the First Amended Complaint that was not
24 dismissed via the Order, or to any amended complaint if filed within the required time period,
25 through April 4, 2011.

26 E. Because the pleadings in this case have not yet settled, the parties to this stipulation
27 request that the Court continue the Case Management Conference currently set for February 24,
28

1 2011, to April 28, 2011, at which time the parties expect to have further information regarding the
2 parameters of this action, anticipated pre-trial proceedings, and the proper scope of discovery, to
3 address scheduling issues with the Court.

4 WHEREFORE, the parties to this stipulation hereby agree and request entry of a court order
5 as follows:

6 **STIPULATION**

7 1. The Case Management Conference currently scheduled to occur on February 24,
8 2011, is requested to be continued to April 28, 2011, at 10:00 a.m., or such other date and time as is
9 convenient for the Court. The parties shall file a supplemental joint case management conference
10 statement at least one week prior to the conference.

11 2. County Defendants' time to file a response to that portion of the First Amended
12 Complaint that was not dismissed via the Order, or to any amended complaint filed within the
13 required time period, is requested to be extended through April 4, 2011.

14 3. This stipulation does not prevent or preclude the parties from seeking additional relief
15 from this Court, to amend this stipulation and order or otherwise.

16 Respectfully submitted,
17 Dated: February 16, 2011 Bruce D. Goldstein, County Counsel

18 By: /s/ Anne L. Keck
19 Anne L. Keck, Deputy County Counsel
20 Attorneys for County Defendants

21 Dated: February 16, 2011 Sally Steinhart, Plaintiff in pro per

22 By: /s/ Sally Steinhart
23 Sally Steinhart

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~~—[PROPOSED]~~ ORDER

Pursuant to and in accordance with the foregoing Stipulation, and with good cause appearing, it is hereby ordered as follows:

1. The Case Management Conference currently scheduled to occur on February 24, 2011, May 5, 2011 shall be continued to April 28, 2011, at 10:00 a.m. The parties shall file a joint supplemental case management conference statement at least one week prior to the conference.

2. County Defendants’ time to file a response to that portion of the First Amended Complaint that was not dismissed via the Order, or to any amended complaint filed within the required time period, is extended through April 4, 2011.

IT IS SO ORDERED.

Date: 2/16/11



HONORABLE RICHARD SEEBORG
United States District Judge