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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

SALLY STEINHART,

No. CV-10-00841 RS

Plaintiff,

v.

COUNTY OF SONOMA, et al.,

Defendants.

**STIPULATION FOR ORDERS: (1) TO
 PERMIT FILING OF A THIRD
 AMENDED COMPLAINT; (2) EXTEND
 TIME TO RESPOND TO COMPLAINT
 AND FILE ANTI-SLAPP MOTION;
 AND (3) CONTINUE CASE
 MANAGEMENT CONFERENCE SET
 FOR MAY 5, 2011; [PROPOSED]
 ORDER**

This joint stipulation is entered into by and between Plaintiff in pro per, Sally Steinhart ("Plaintiff"), and Defendants the County of Sonoma, former Sheriff-Coroner William Cogbill, and County employees Michael Shanahan, Caroline Jaap, Jo Weber, Nicholas Honey, Jerry Allen, Betty Johnson and Robin Smith (collectively, "County Defendants"). Through this stipulation, these parties make three separate requests: (1) for entry of an order permitting the filing of a third amended complaint on or before April 29, 2011; (2) for entry of an order extending the time for County Defendants to respond to the complaint, and to file an Anti-SLAPP Motion under California Code of Civil Procedure Section 425.16, to May 31, 2011; and (3) for entry of an order continuing the Case Management Conference currently set for May 5, 2011, to July 14, 2011, or such other date

1 as is convenient for the Court. Defendant the State Department of Social Services and other named
2 defendants have not appeared in this action, and are not parties to this stipulation.

3 **RECITALS**

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

8 B. The Court resolved the County Defendants’ Motions on February 7, 2011, through its
9 “Order Granting in Part and Denying in Part Motion to Dismiss and Denying Motion for a More
10 Definite Statement” (Dkt. No. 34) (hereinafter, the “2/7/11 Order”). Thereafter, Plaintiff timely
11 filed her Second Amended Complaint (the “SAC”) on March 9, 2011 (Dkt. No. 38).

12 C. In the 2/7/11 Order, the Court granted County Defendants’ request for dismissal with
13 leave to amend on several claims, providing direction to Plaintiff as to the nature of the allegations
14 required to state a claim for relief. Counsel for County Defendants has discussed with Plaintiff her
15 belief that the SAC does not satisfy the provisions of the 2/7/11 Order in several respects, and
16 Plaintiff has agreed to consider the issues counsel raises. In addition, counsel for County
17 Defendants is providing informal discovery to Plaintiff to address certain issues raised in the SAC,
18 which Plaintiff has agreed to consider in connection with further amending the SAC.

19 D. The parties request that Plaintiff be provided with the opportunity to further amend
20 her complaint to conform to the Court’s 2/7/11 Order, as well as address factual issues verified in
21 documents currently being provided to Plaintiff. To ensure Plaintiff has sufficient time to consider
22 such issues and draft such a pleading, the parties request that Plaintiff be provided through April 29,
23 2011, in which to file a third amended complaint.

24 E. Pursuant to previous stipulation and order, the time in which County Defendants may
25 file and serve their response to the current SAC, as well as file an Anti-SLAPP Motion under
26 California Code of Civil Procedure Section 425.16, has been extended through April 4, 2011 (Dkt.
27 Nos. 33, 37). Further, in its Order entered February 16, 2011, the Court also continued the Case
28 Management Conference in this case to May 5, 2011 (Dkt. No. 37).

1 F. The parties also request that the County Defendants be provided with additional time
2 in which to file a response to the SAC or any third amended complaint (if filed), through May 31,
3 2011. In addition, the parties request that the County Defendants be provided with an additional
4 extension of time in which to file its Anti-SLAPP motion under California Code of Civil Procedure
5 Section 425.16 also through May 31, 2011, to permit coordination of pleadings and motions. This
6 Court has the discretion under California Code of Civil Procedure Section 425.16(f) to extend the
7 initial 60-day filing period for Anti-SLAPP motions to “any later time upon terms it deems proper.”
8 The parties believe that an extension for the filing of such a motion through May 31, 2011, is
9 appropriate under the circumstances, to permit the parties to attempt to resolve issues relevant to
10 such motions informally and without the necessity of involving the Court.

11 G. Based on the requests contained in this stipulation, and due to the fact that the
12 pleadings in this case have not yet settled, the parties also request that the Court continue the Case
13 Management Conference (currently set for May 5, 2011) to July 14, 2011, or such other date as is
14 convenient for the Court. The parties expect by such time to have further information regarding the
15 parameters of this action, anticipated pre-trial proceedings, and the proper scope of discovery, to
16 address scheduling issues with the Court.

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

19 STIPULATION

20 1. The parties request that Plaintiff be permitted to file a third amended complaint in this
21 case through and including April 29, 2011.

22 2. The time in which County Defendants may file a response to the current Second
23 Amended Complaint or any third amended complaint (if filed) is requested to be extended through
24 and including May 31, 2011.

25 3. The time in which County Defendants may file its Anti-SLAPP motion under
26 California Code of Civil Procedure Section 425.16 as to certain State Law claims alleged herein is
27 requested to be extended through and including May 31, 2011.
28

1 4. The Case Management Conference currently scheduled to occur on May 5, 2011, is
2 requested to be continued to July 14, 2011, at 10:00 a.m., or such other date and time as is
3 convenient for the Court. The parties shall file a supplemental joint case management conference
4 statement at least one week prior to the conference.

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

7 Respectfully submitted,

8 Dated: April 4, 2011

Bruce D. Goldstein, County Counsel

9 By: /s/ Anne L. Keck
10 Anne L. Keck, Deputy County Counsel
 Attorneys for County Defendants

11
12 Dated: April 4, 2011

Sally Steinhart, Plaintiff in pro per

13 By: /s/ Sally Steinhart
14 Sally Steinhart

1 ~~PROPOSED~~ ORDER

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

4 1. Plaintiff is permitted to file a third amended complaint in this case through and including
5 April 29, 2011.

6 2. The time in which County Defendants may file a response to the current Second
7 Amended Complaint or any third amended complaint (if filed) is extended through and including
8 May 31, 2011.

9 3. The time in which County Defendants may file its Anti-SLAPP motion under California
10 Code of Civil Procedure Section 425.16 as to certain State Law claims alleged herein is extended
11 through and including May 31, 2011.

12 4. The Case Management Conference currently scheduled to occur on May 5, 2011, is
13 continued to July 14, 2011, at 10:00 a.m., on ~~XXXXXXXXXXXXXXXXXXXXXXX~~. The parties shall file a
14 supplemental joint case management conference statement at least one week prior to the conference.

15 IT IS SO ORDERED.

16 Date: 4/4/11


HONORABLE RICHARD SEEBORG
United States District Judge