

E-Filed 8/31/11

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4 Plaintiff in Pro Per

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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SAN FRANCISCO DIVISION

11

SALLY STEINHART,

No. CV-10-00841 RS

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Plaintiff,

**SECOND STIPULATION FOR
ORDERS TO: (1) CONTINUE
HEARING ON MOTIONS TO DISMISS
AND TO STRIKE; (2) EXTEND
BRIEFING SCHEDULES; AND (3)
CONTINUE CASE MANAGEMENT
CONFERENCE; [~~PROPOSED~~] ORDER**

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v.

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COUNTY OF SONOMA, et al.,

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Defendants.

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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, Brian K. Covington, Caroline Jaap, Jo Weber, Nicholas Honey, Jerry Allen, Betty Johnson and Robin Smith (collectively, “County Defendants”). Through this second stipulation, these parties request the Court to enter an order: (1) continuing the hearing on the pending Motion to Dismiss Third Amended Complaint, and Anti-SLAPP Motion to Strike, to October 27, 2011; (2) extending the briefing schedule on such Motions to permit Plaintiff to file her oppositions through September 26, 2011, and for County Defendants to file their replies through October 7, 2011; and (3) continuing the Case Management Conference, currently set for September 29, 2011, to October 27, 2011, at 1:30 p.m., to enable it to be heard at the same time as the pending Motions. Defendant the State Department of Social Services and other named defendants have not appeared in this action, and are not parties to this stipulation.

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Second Stipulation for Orders to: (1) Continue Hearing on Motions to Dismiss and to Strike; (2) Extend Briefing Schedule; *et al.*; [Proposed] Order

1 **RECITALS**

2 A. Plaintiff initiated this action on February 26, 2010, and later filed her Third Amended
3 Complaint for Declaratory and Injunctive Relief and Damages on June 27, 2011 (Dkt. No. 46, the
4 “TAC”). In response, on July 29, 2011, County Defendants filed their Motion to Dismiss the TAC
5 (Dkt. No. 47) and Anti-SLAPP Motion to Strike under CCP § 425.16 (Dkt. No. 50), collectively
6 referred to herein as the “Motions”.

7 B. Pursuant to a previous stipulation of the parties approved by the Court, Plaintiff’s
8 time to file her oppositions to the Motions was extended through August 31, 2011, County
9 Defendants’ time to file their replies was extended through September 8, 2011, and the hearings
10 were continued to September 29, 2011 (Dkt. No. 53). In addition, the Court also approved the
11 parties’ stipulation to hold the initial Case Management Conference at the same time as the hearing
12 on the Motions, on September 29, 2011, at 1:30 p.m. (*Id.*)

13 C. Plaintiff has requested additional time in which to prepare and file her oppositions to
14 the Motions through September 26, 2011, as she is in the process of moving her office and has not
15 been able to complete such oppositions in time to meet current deadlines. County Defendants have
16 consented to Plaintiff’s requested extension of time, and Plaintiff has agreed to extend County
17 Defendants’ time in which to file their replies to the Motions through October 7, 2011. The parties
18 agree that, aside from the dates set forth in Section B, above, there are no other dates or scheduling
19 issues that affect the requested extensions of time.

20 D. Based on the requested extension of the briefing schedule, the parties also request that
21 the hearing on the pending Motions, currently set for September 29, 2011, be continued to October
22 27, 2011, at 1:30 p.m., and that the initial Case Management Conference be continued to that date
23 and time as well.

24 WHEREFORE, the parties to this stipulation hereby agree and request entry of a Court order
25 as follows:

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STIPULATION

1. The hearing on County Defendants’ pending Motion to Dismiss the TAC (Dkt. No. 47) and Anti-SLAPP Motion to Strike under CCP § 425.16 (Dkt. No. 50) be continued to October 27, 2011, at 1:30 p.m.

2. The briefing schedule on such Motions be extended to permit Plaintiff to file her oppositions through September 26, 2011, and for County Defendants to file their replies through October 7, 2011.

3. The Case Management Conference, currently set for September 29, 2011, be continued to October 27, 2011, at 1:30 p.m. A joint case management conference statement shall be filed one week prior to the conference.

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

Respectfully submitted,

Dated: August 30, 2011

Bruce D. Goldstein, County Counsel

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

Dated: August 30, 2011

Sally Steinhart, Plaintiff in pro per

By: /s/ Sally Steinhart
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 hearing on County Defendants’ pending Motion to Dismiss the TAC (Dkt. No. 47) and Anti-SLAPP Motion to Strike under CCP § 425.16 (Dkt. No. 50) is continued to October 27, 2011, at 1:30 p.m.

2. The briefing schedule on such Motions is extended to permit Plaintiff to file her oppositions through September 26, 2011, and for County Defendants to file their replies through October 7, 2011.

3. The Case Management Conference, currently set for September 29, 2011, is continued to October 27, 2011, at 1:30 p.m. A joint case management conference statement shall be filed one week prior to the conference.

IT IS SO ORDERED.

Date: 8/31/11



HONORABLE RICHARD SEEBORG
United States District Judge