\*E-Filed 6/16/10\*

		*E-Filed 6/10/10**	
1 2 3 4 5 6 7 8 9	STEVEN M. WOODSIDE, State Bar No. 58684 County Counsel ANNE L. KECK, State Bar No. 136315 Deputy County Counsel County of Sonoma 575 Administration Drive, Room 105A Santa Rosa, California 95403-2815 Telephone: (707) 565-2421 Facsimile: (707) 565-2624 E-mail: akeck@sonoma-county.org  Attorneys for Defendants the County of Sonoma, Sheriff-Coroner William Cogbill, and County employees Michael Shanahan, Caroline Japp, Jo Weber, and Robin Smith  UNITED STATES DIST	TRICT COURT	
11	NORTHERN DISTRICT OF CALIFORNIA		
12	SAN FRANCISCO DIVISION		
13	SALLY STEINHART,	No. CV-10-00841 RS	
14	Plaintiff,		
15	v.		
16 17 18 19 20 21	COUNTY OF SONOMA, SHERIFF-CORONER BILL COGBILL and DEPUTY SHERIFFS M. SHANAHAN and CAROLYN ZOE; HUMAN SERVICES DEPARTMENT DIRECTOR JO WEBER; FAMILY, YOUTH & CHILDREN'S SERVICES DIVISION DIRECTOR CAROL BAUER, AND CHILD WELFARE SERVICES/PROTECTIVE SERVICES SOCIAL WORKER ROBIN SMITH, individually and in their official capacities, CALIFORNIA DEPARTMENT OF SOCIAL SERVICES, DOES 1-50, et al.,	SECOND STIPULATION TO (1) PERMIT FILING OF AN AMENDED COMPLAINT, AND (2) EXTEND COUNTY DEFENDANTS' TIME TO RESPOND TO THE COMPLAINT; [PROPOSED] ORDER	
22	Defendants.		
23			
24	This joint second stipulation and request for entry of order is entered into by and between		
25	Plaintiff in pro per, Sally Steinhart ("Plaintiff"), and Defendants the County of Sonoma, Sheriff-		
26	Coroner William Cogbill, Sheriff's Deputy Michael Shanahan, Sheriff's Deputy Caroline Japp		
27	(erroneously sued herein as Carolyn Zoe), and Sonoma County employees Jo Weber and Robin		
28			
	Second Stipulation to (1) Permit Filing of an Amended Complaint, and (2) Extend County Defendants' Time to Respond to the Complaint; [Proposed] Order 1	USDC Case No. CV-10-00841 RS	

Smith (collectively, "County Defendants"). Defendant the State Department of Social Services is not a party to this stipulation. This stipulation and concomitant request for order is made based upon Plaintiff's request for additional time in which to prepare, file and serve an amended complaint, and a concomitant extension of time for County Defendants to file a responsive pleading. The terms and provisions of this stipulation and request for order are set forth below.

## **RECITALS**

- A. Plaintiff filed her Complaint for Declaratory and Injunctive Relief and Damages herein on February 26, 2010 (the "Complaint"). Plaintiff believes that she effectuated service of the Complaint on all County Defendants identified above on or about May 12, 2010. Plaintiff has not yet effectuated service on Defendant the State Department of Social Services, nor Defendant and former Sonoma County employee Carol Bauer (retired).
- B. Pursuant to a previous stipulation of Plaintiff and County Defendants, the Court entered an order, *inter alia*, permitting Plaintiff to file and serve an amended complaint through June 15, 2010, and providing County Defendants with additional time in which to respond to the Complaint or amended complaint through July 15, 2010 (Docket No. 4).
- C. Plaintiff has not yet been able to complete the preparation of her first amended complaint. Accordingly, Plaintiff requests additional time in which to file and serve her amended complaint, through June 18, 2010, and has agreed to permit County Defendants additional time in which to serve their responsive pleading, through July 19, 2010.

WHEREFORE, the parties hereby stipulate and request entry of a court order as follows:

## **STIPULATION**

- 1. Should Plaintiff desire to amend her complaint, she must file and serve an amended complaint in this action on or before June 18, 2010.
- 2. County Defendants shall file and serve their responsive pleading to either the initial Complaint or any amended complaint, as applicable, on or before July 19, 2010.

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1	3. This stipulation does not prevent or preclude the parties from seeking additional relie	
2	from this Court, to amend this stipulation and order or otherwise.	
3		Respectfully submitted,
4	Dated: June 16, 2010	Stephen M. Woodside, County Counsel
5		By: /s/ Anne L. Keck Anne L. Keck, Deputy County Counsel
6		Attorneys for County Defendants
7	Dated: June 16, 2010	Sally Steinhart, Plaintiff in pro per
8		By: /s/ Sally Steinhart Sally Steinhart
9		
10	*	* *
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12	-[PROPOSED] ORDER	
13	Pursuant to the foregoing stipulation, and with good cause appearing,	
14	IT IS HEREBY ORDERED that Plaintiff shall have through June 18, 2010, to file an amended	
15	complaint, and County Defendants shall have through July 19, 2010, to file a responsive pleading to	
16	either the initial or amended complaint, as applicable.	
17	Date: 6/16/10	Will Seeling
<ul><li>18</li><li>19</li></ul>	Date:	HONORABLE RICHARD SEBORG
20		United States District Judge
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	Second Stipulation to (1) Permit Filing of an Amended	