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7 Special Appearance as Attorneys for
 the County of Sonoma (Defendant
 8 Sonoma County Sheriff's Office)
 and Sheriff's Deputy Greg Myers
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10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

12 MARK AARON HAYNIE, BRENDAN
 JOHN RICHARDS, THE CALGUNS
 13 FOUNDATION, INC., and THE SECOND
 AMENDMENT FOUNDATION, INC.,
 14

CASE NOS. 3:10-CV-01255 SI
 3:11-CV-02493 SI
 (Consolidated Cases)

15 Plaintiffs,

15 vs.

16 KAMALA HARRIS, Attorney General of
 California (in her official capacity) and
 17 CALIFORNIA DEPARTMENT OF
 JUSTICE, CITY OF ROHNERT PARK,
 18 OFFICER DEAN BECKER, and DOES 1 to
 20,

**STIPULATION TO RESCHEDULE
 CASE MANGEMENT
 CONFERENCE, ETC.; [PROPOSED]
 ORDER**

20 Defendants.

21 BRENDAN JOHN RICHARDS, THE
 CALGUNS FOUNDATION, INC., and THE
 22 SECOND AMENDMENT FOUNDATION,
 INC.
 23

CASE NO. 3:11-CV-05580 SI
 (Related Case)

24 Plaintiffs,

24 vs.

25 KAMALA HARRIS, ATTORNEY General
 of California (in her official capacity) and
 26 CALIFORNIA DEPARTMENT OF
 JUSTICE, SONOMA COUNTY
 27 SHERIFFS' OFFICE, SHERIFF'S
 DEPUTY GREG MYERS, and DOES 1 to
 28 20,

**STIPULATION TO RESCHEDULE
 CASE MANGEMENT
 CONFERENCE, ETC.;[PROPOSED]
 ORDER**

Defendants.

1 MAX JOSEPH PLOG-HOROWITZ, THE
2 CALGUNS FOUNDATION, INC., and THE
3 SECOND AMENDMENT FOUNDATION,
4 INC.,

5 Plaintiffs,

6 vs.

CASE NO. 3:12-CV-0452 LB
(Related Case)

7 KAMALA HARRIS, Attorney General of
8 California, CALIFORNIA DEPARTMENT
9 OF JUSTICE, COTATI POLICE
10 DEPARTMENT, CITY OF COTATI,
11 ANDREW LYSSAND, and DOES 1 to 20,

12 Defendants.

**STIPULATION TO RESCHEDULE
CASE MANGEMENT
CONFERENCE, ETC.; [PROPOSED]
ORDER**

13 This joint stipulation and request for entry of an order is entered into by all parties in the
14 above-captioned related actions, through their respective counsel of record. The purpose of this
15 stipulation and request for entry of order is twofold: (1) to request the Court to reschedule the
16 jointly-set Case Management Conference from its current date of March 30, 2012, to May 25,
17 2012; and (2) to extend the time for Defendants the Sonoma County Sheriff's Department and
18 Sheriff's Deputy Greg Myers to file a response to the Complaint (in Case No. 3:11-CV-05580
19 SI) through May 1, 2012. The parties to this stipulation include the following: Plaintiffs Mark
20 Aaron Haynie, Brendan John Richards, the Calguns Foundation, Inc., The Second Amendment
21 Foundation, Inc., and Max Joseph Plog-Horowitz (collectively, "Plaintiffs"); Defendant Kamala
22 Harris, Attorney General, and the California Department of Justice (the "State Defendants"); the
23 City of Rohnert Park and Office Dean Becker (collectively, the "Rohnert Park Defendants"); the
24 Sonoma County Sheriff's Office and Sheriff's Deputy Greg Myers (collectively, the "Sonoma
25 Defendants"); and the Cotati Police Department, City of Cotati, and Andrew Lyssand
(collectively, the "Cotati Defendants").

26 RECITALS

27 A. Each of the above-captioned cases has been deemed related to the others, and the
28 Court has previously ordered that the Case Management Conference on all cases be held on
March 30, 2012. (See e.g., Case No. 3:11-CV-05580-SI, Dkt. No. 17, filed March 1, 2012.)

1 B. Aside from the Case Management Conference and related dates, the only other
2 matter currently on calendar in any of the cases is the Rohnert Park Defendants' Motion to
3 Dismiss (in Case No. 3:11-CV-02493-SI), set to be heard on April 20, 2012, at 9:00 a.m.

4 C. Sonoma Defendants have not yet responded to the complaint in Case No. 3:11-
5 CV-05580-SI, and have informed Plaintiffs that they intend to file a Motion to Dismiss the
6 Complaint. Before investing resources in preparing the Motion to Dismiss, counsel for the
7 parties have initiated settlement discussions, which they believe at this time may be fruitful. To
8 provide time in which to pursue settlement discussions, and to conserve the resources of the
9 parties and the Court, Plaintiffs have agreed to extend the time for Sonoma Defendants to
10 respond to the Complaint through and including May 1, 2012.

11 D. None of the Defendants have filed an answer in any of these related cases as of
12 the date of this stipulation. Because the pleadings have not yet settled in any of these cases, the
13 parties request that the Court reschedule the Case Management Conference in all of the cases,
14 currently set for March 30, 2012, to May 25, 2012, (or such other date as is convenient for the
15 Court). The rescheduling of the Case Management Conference will enable the parties to better
16 ascertain the parameters of these actions, anticipated pre-trial proceedings, and the proper scope
17 of discovery, to be able to address scheduling issues with the Court.

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

20 **STIPULATION**

21 1. The Case Management Conference, currently scheduled to occur on March 30,
22 2012, is requested to be rescheduled in all of these related cases to May 25, 2012, at 2:30 p.m., or
23 such other date and time as is convenient for the Court. The parties shall file joint case
24 management conference statements in each of the cases at least one week prior to the conference.

25 2. Sonoma Defendants' time in which to file a response to the Complaint in Case
26 Number 3:11-CV-05580-SI is requested to be extended through and including May 1, 2012.

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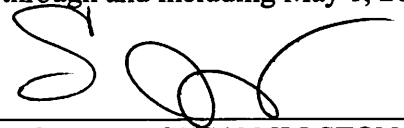
ORDER

Pursuant to the foregoing stipulation of the parties, and with good cause appearing,
IT IS HEREBY ORDERED AS FOLLOWS:

1. The Case Management Conference, currently scheduled to occur on March 30, 2012, is hereby rescheduled for all of these related cases to May 25, 2012, at 2:30 p.m., to be held in Courtroom 10, 19th Floor of the Federal Building, San Francisco Division of this Court. The parties shall file joint case management conference statements in each of the cases at least one week prior to the conference.

2. Sonoma Defendants' time in which to file a response to the Complaint in Case Number 3:11-CV-05580-SI, is hereby extended through and including May 1, 2012.

Dated: 3/20/12



HONORABLE SUSAN ILLSTON
United States District Judge

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ELECTRONIC CASE FILING ATTESTATION

I, Anne L. Keck, am the ECF User whose identification and password are being used to file this **STIPULATION TO RESCHEDULE CASE MANGEMENT CONFERENCE, ETC.; [PROPOSED] ORDER** on behalf of all parties pursuant to Civil Local Rules 7-11. In compliance with General Order No. 45(X)(B), I hereby attest that the concurrence in the filing of this document has been obtained from it signatories.

Dated: March 19, 2012

Sonoma County Counsel

By: /s/ Anne L. Keck
Anne L. Keck
Deputy County Counsel