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8
 9 IN THE UNITED STATES DISTRICT COURT
 10 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 **MARK AARON HAYNIE, BRENDAN
 12 JOHN RICHARDS, THE CALGUNS
 FOUNDATION, INC., and THE SECOND
 13 AMENDMENT FOUNDATION, INC.,**
 14 Plaintiffs,
 15 v.
 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 (RP134), and
 DOES 1 TO 20,**
 19 Defendants.

10-cv-1255-SI
 11-cv-2493 SI
 (Consolidated Cases)

**STIPULATION and JOINT
 ADMINISTRATIVE MOTION and
 PROPOSED ORDER
 Re: Case Management**

20 **BRENDAN JOHN RICHARDS, THE
 CALGUNS FOUNDATION, INC., and THE
 21 SECOND AMENDMENT FOUNDATION,
 INC. ,**
 22 Plaintiffs,
 23 v.
 24 **KAMALA HARRIS, Attorney General of
 California (in her official capacity),
 25 CALIFORNIA DEPARTMENT OF
 JUSTICE, SONOMA COUNTY
 26 SHERIFF'S OFFICE, SHERIFF'S
 DEPUTY GREG MYERS (SD1023) and
 27 DOES 1 TO 20**
 28 Defendants.

11-cv-5580 SI
 (Related Case)

**STIPULATION and JOINT
 ADMINISTRATIVE MOTION and
 PROPOSED ORDER
 Re: Case Management**

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

12-cv-00452 (LB)
(Related Case)

Plaintiffs,

STIPULATION and JOINT
ADMINISTRATIVE MOTION and
PROPOSED ORDER
Re: Case Management

v.

5 **KAMALA HARRIS, Attorney General of**
6 **California, CALIFORNIA DEPARTMENT**
7 **OF JUSTICE, COTATI POLICE**
8 **DEPARTMENT, CITY OF COTATI,**
9 **ANDREW LYSSAND (CO0339) and DOES**
10 **1 TO 20,**

Defendants.

11 IT IS HEREBY STIPULATED¹ by and between the parties hereto through their respective
12 attorneys of record that the pending Case Management Conference currently set for July 27, 2012
13 in Courtroom 10, 19th Floor of the U.S. District Court for the Northern District of California
14 should be reset.

15 The Defendants in *Richards v. Harris I (Rohnert Park)*, Case No.: 3:11-CV-02493 SI have
16 a motion to dismiss under submission that has been fully briefed and was argued on May 4, 2012.
17 The parties believe that it would be a more productive use of the Court's time and resources to
18 have the Case Management Conference after a ruling on the motion to dismiss has been issued

19 Accordingly, the parties propose that the Court reset the Case Management Conference to
20 some date after the Court anticipates releasing its order from the May 4, 2012 hearing.

21 For the convenience of the Court and its staff, Plaintiffs' counsel advises that he is
22 unavailable on the following Fridays: August 10 and 17, September 27, and October 5, 2012.

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26 ¹ *Haynie v. Harris*, Case No.: 3:10-CV-01255 SI was ordered consolidated with *Richards*
27 *v. Harris*, Case No.: 3:11-CV-02493 SI, in an order filed on October 22, 2011. (See Documents #
28 42 and #15 respectively.) The second *Richards v. Harris*, Case No.: 3:11-CV-05580 was ordered
to be related with the first two cases in an order filed on December 21, 2011. (See documents #47
and # 20 respectively.) The *Ploghorowitz v. Harris*, Case No.: 3:12-CV-0452 SI was ordered to
be related on April 11, 2012. (See documents #32 and #20.)

1 **SO STIPULATED.**

2 Dated: July 19, 2012

Dated: July 19, 2012

3 /s/ Ross Moody

/s/ Donald Kilmer

4 _____
5 Ross Moody
6 Counsel for Defendants
7 Harris & California Dept. of Justice

Donald Kilmer
Counsel for Plaintiffs

7 Dated: July 19, 2012

8 /s/ Robert W. Henkels

9 _____
10 Robert W. Henkels
11 Counsel for Defendants
12 City of Rohnert Park & Becker
13 Counsel for Defendants
14 Cotati Police Department,
15 City of Cotati, & Lyssand

14 **ATTESTATION FOR COMPLIANCE WITH GENERAL ORDER 45 AND LOCAL
15 RULE VIII.B.**

16 I, Ross C. Moody, declare under penalty of perjury under the laws of California and the
17 United States that I have in my possession e-mail correspondence from Donald Kilmer and
18 Robert Henkels that the content of this document is acceptable to all persons required to sign the
19 document. I declare that this document was signed in San Francisco, CA on July 19, 2012.

20
21 /s/ Ross Moody

22 _____
23 Ross Moody
24 Deputy Attorney General
25 Attorney for Defendants
26 California Department of Justice and
27 Attorney General Kamala D. Harris

25 **ORDER**

26 The Case Management Conference in these consolidated and related matters currently set
27 for July 27, 2012 is reset to: (Date) August 24, 2012, at (Time): 3:00 p.m.,
28 in Courtroom 10, 19th Floor of the U.S. District Court for the Northern District of California –

1 San Francisco. A Joint Case Management Conference Statement shall be filed seven (7) calendar
2 days before the new date.

3 Date: 7/24/12



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5 United States District Judge

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