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9 Attorneys for Plaintiffs

10 UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA

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

15 Plaintiffs,

16 vs.

18 KAMALA HARRIS, Attorney General  
 of California, CALIFORNIA  
 19 DEPARTMENT OF JUSTICE, CITY  
 OF ROHNERT PARK, and OFFICER  
 20 DEAN BECKER (RP134)

21 Defendants.

Case No.: 3:10-CV-01255 SI

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

23 IT IS HEREBY STIPULATED by and between the parties hereto through  
 24 their respective attorneys of record that the pending Case Management Conference  
 25 currently set for April 2, 2013 in Courtroom 10, 19<sup>th</sup> Floor of the U.S. District Court  
 26 for the Northern District of California should be reset.

27 The Rohnert Park Defendants and the Plaintiffs are still engaged in earnest  
 28 self-directed settlement discussions.

1 If a settlement can be reached, then the remaining parties (California  
2 Department of Justice and the Plaintiffs) will proceed with setting hearing dates for  
3 dispositive motions at the next Case Management Conference.

4 Furthermore, the Plaintiffs and the California Department of Justice are  
5 aware that several bill have been introduced in the State Legislature that may  
6 moot this case. Those parties may seek another continuance and/or stay to conserve  
7 resources of the parties and the Court.

8 The parties propose that the Court reset the Case Management Conference to  
9 a convenient date in June of 2013 in order to give the parties engaged in settlement  
10 discussions the time necessary to conclude that process or to request formal ADR  
11 assistance from the Court.

12 **SO STIPULATED.**

13 Date: March 26, 2013

Date: March 26, 2013

14 \_\_\_\_\_  
15 /s/  
16 Ross Moody,  
17 Counsel for Defendants  
18 Harris & California Dept. of Justice

\_\_\_\_\_ /s/  
Donald Kilmer  
Counsel for Plaintiffs

17 Date: March 26, 2013

18 \_\_\_\_\_  
19 /s/  
20 Robert W. Henkels  
21 Counsel for Defendants  
22 City of Rohnert Park & Becker

23 **ATTESTATION FOR COMPLIANCE WITH GENERAL ORDER 45 AND**  
24 **LOCAL RULE VIII.B.**

25 I, Donald Kilmer, declare under penalty of perjury under the laws of California  
26 and the United States that I have in my possession e-mail correspondence from  
27 Ross Moody, and Robert Henkels that the content of this document is acceptable to  
28 all persons required to sign the document. I declare that this document was signed  
in San Jose, CA on March 26, 2013.

27 \_\_\_\_\_  
28 /s/  
Donald Kilmer  
Attorney for Plaintiffs

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**ORDER**

The Case Management Conference currently set for April 2, 2013 is reset to:  
(Date) 6/21/13, at (Time): 3:00 p.m., in Courtroom 10,  
19<sup>th</sup> Floor of the U.S. District Court for the Northern District of California – San  
Francisco. A Joint Case Management Conference Statement shall be filed seven (7)  
calendar days before the new date.

Date: 4/1/13

  
United States District Judge