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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

CURRENT CMC: JUNE 21, 2013

PROPOSED CMC: SEPTEMBER 6, 2013

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 June 21, 2013 in Courtroom 10, 19th Floor of the U.S. District
 26 Court 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 or require amendments to the pleadings. Several of those bills have
7 passed at least one legislative house and are pending in the other. Those parties
8 may seek another continuance and/or stay to conserve resources of the parties and
9 the Court.

10 The parties propose that the Court reset the Case Management Conference to
11 September 6, 2013 in order to give the parties engaged in settlement discussions
12 the time necessary to conclude that process or to request formal ADR assistance
13 from the Court.

14 **SO STIPULATED.**

15 Date: June 14, 2013

Date: June 14, 2013

16 /s/

/s/

17 Mark Beckington
18 Supervising Deputy Attorney General
19 for Ross Moody,
20 Counsel for Defendants
21 Harris & California Dept. of Justice

Donald Kilmer
Counsel for Plaintiffs

22 Date: June 14, 2013

23 /s/

24 Robert W. Henkels
25 Counsel for Defendants
26 City of Rohnert Park & Becker

27 **ATTESTATION FOR COMPLIANCE WITH GENERAL ORDER 45 AND
28 LOCAL RULE VIII.B.**

I, Donald Kilmer, declare under penalty of perjury under the laws of California and the United States that I have in my possession e-mail correspondence from Ross Moody, and Robert Henkels that the content of this document is acceptable to all persons required to sign the document. I declare that this document was signed in San Jose, CA on June 14, 2014.

29 /s/
30 Donald Kilmer, Attorney for Plaintiffs

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ORDER

The Case Management Conference currently set for June 21, 2013 is reset to:
(Date) 9/6/13, at (Time): 3:00 p.m., in Courtroom 10,
19th 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: 6/17/13



United States District Judge

No further continuances will be granted.