

1 Rebecca S. Widen, SBN 219207
2 HAAPALA, THOMPSON & ABERN, LLP
3 1939 Harrison Street, Suite 800
4 Oakland, California 94612
5 Tel: 510-763-2324
6 Fax: 510-273-8570

7
8 Attorneys For Defendants
9 COUNTY OF ALAMEDA, KATHERINE MOORE,
10 and THOMAS NOLAN

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

13 AARON FRAYER, individually and as Next) Case No.: C10-4095 CRB (BZ)
14 Friend of A.F., a minor,)
15) **STIPULATION AND [PROPOSED]**
16 Plaintiffs,) **ORDER TO CONTINUE SETTLEMENT**
17) **CONFERENCE AND CASE**
18 vs.) **MANAGEMENT CONFERENCE**
19)
20 COUNTY OF ALAMEDA; KATHERINE)
21 MORE, individually and in her official)
22 capacity as social worker for Alameda County)
23 Department of Social Services; THOMAS)
24 NOLAN, individually and in his official)
25 capacity as social worker for Alameda County)
26 Department of Social Services; CITY OF)
27 OAKLAND; JAMES MOORE, individually)
28 and in his official capacity as a police officer)
for the City of Oakland; D. MING,)
individually and in his official capacity as)
sergeant for the City of Oakland; and DOES 1)
through 20,)
Defendants.)

22 The parties hereto, by and through their undersigned counsel, jointly request that the
23 settlement conference scheduled for May 12, 2011, at 9:00 a.m., as well as the case management
24 conference scheduled for May ²⁷ 2011, at 8:30 a.m., be continued for a period of 90 days.

25 The reason for the requested continuance is that the parties have not yet completed the
26 initial discovery necessary to ensure a meaningful and productive settlement conference.
27 Specifically, the parties require additional time to identify and obtain the discoverable
28

Haapala, Thompson & Abern LLP
Attorneys At Law
Park Plaza Building
1939 Harrison St., Suite 800
Oakland, California 94612
Telephone: 510-763-2324
Facsimile: 510-273-8570

1 documents contained in the minor plaintiff's juvenile court records through the Welfare and
2 Institutions Code section 827 process, and thereafter take some initial depositions. The parties
3 are currently working on the form of a proposed order for disclosure of juvenile court records
4 and anticipate filing same within the next 10 days.

5 IT IS SO STIPULATED.

6 Dated: April 28, 2011

LAW OFFICES OF DAVID J. BEAUVAIS

7
8 By: */s/ David J. Beauvais
9 David J. Beauvais
10 Attorneys For Plaintiffs
*Mr. Beauvais provided his verbal consent that this
document be electronically filed.

11 Dated: April 28, 2011

HAAPALA, THOMPSON & ABERN, LLP

12
13 By: /s/ Rebecca S. Widen
14 Rebecca S. Widen
15 Attorneys For Defendants
COUNTY OF ALAMEDA, KATHERINE
MOORE and THOMAS NOLAN

16 Dated: April 28, 2011

17 JOHN A. RUSSO, City Attorney
18 RANDOLPH W. HALL, Chief Assistant City Attorney
19 WILLIAM E. SIMMONS, Supervising Trial Attorney
20 CAROLYN O. TSAI, Deputy City Attorney

21 By: */ Carolyn O. Tsai
22 Carolyn O. Tsai
23 Attorneys for Defendants
CITY OF OAKLAND, JAMES MOORE and
D. MING
*Ms. Tsai provided her verbal consent that this
document be electronically filed.

24 **ORDER**

25 Pursuant to stipulation and for good cause shown, it is SO ORDERED. The parties' case
26 management conference is hereby rescheduled to August 19, 2011, at 8:30 a.m. The parties
27 shall contact Magistrate Judge Bernard Zimmerman's chambers to reschedule the settlement
28 /

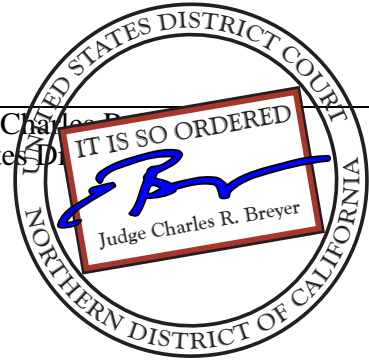
/

Haapala, Thompson & Abern LLP
Attorneys At Law
Park Plaza Building
1939 Harrison St., Suite 800
Oakland, California 94612
Telephone: 510-763-2324
Facsimile: 510-273-8570

1 conference for an available date prior to August 19, 2011.

2 Dated: May 4, 2011

3
4 Honorable Charles R. Breyer
United States District Judge



5
6
7
8
9
10
11
12
13 Haapala, Thompson & Abern LLP
Attorneys At Law
Park Plaza Building
1939 Harrison St., Suite 800
Oakland, California 94612
Telephone: 510-763-2324
Facsimile: 510-273-8570
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28