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9 Appearing *Pro Se*

10
 11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA
 13

14 MARK HAINES,
 15
 Plaintiff,
 16
 vs.

17 DARYL B. BRAND, MFT, individually and in
 18 her official capacity; THE CITY OF
 BERKELEY, a municipality; BETH
 19 MEYERSON, in her official capacity;
 KAREN TRIBBLE, in her official capacity;
 20 DAVID WEE, LCSW, individually and in his
 official capacity; HARVEY S. TURECK,
 21 individually and in his official capacity; FRED
 MEDRANO, individually and in his official
 22 capacity; JANE DOE #1, individually and in
 her official capacity; and DOES #2 through 12,
 23 in their individual and official capacities,

Defendants.

NO. C11-01335 EMC

**STIPULATION AND [PROPOSED]
 ORDER GRANTING EXTENSION OF
 TIME FOR DEFENDANT HARVEY
 TURECK TO FILE RESPONSIVE
 PLEADING**

24
 25 IT IS HEREBY STIPULATED by and between plaintiff Mark Haines, appearing *pro se*,
 26 and defendant Harvey Tureck (“defendant Tureck”), through the Berkeley City Attorney’s
 27 Office, to extend the time for defendant Tureck to file a responsive pleading from July 7, 2011 to
 28 July 22, 2011.

1 There is good cause for the stipulation to extend time as follows: defendant Tureck was
2 served with the original Complaint on June 16, 2011, and the City of Berkeley received a copy of
3 the original Complaint from the U.S. Marshall's Office on July 1, 2011. Plaintiff has filed a First
4 Amended Complaint, which he provided to counsel for defendant Tureck and the City of
5 Berkeley by email on July 1, 2011. This extension will provide defendant Tureck time to
6 analyze and prepare a response to the First Amended Complaint. This extension will also allow
7 for the filing of a joint responsive pleading.

8 Thus, the parties stipulate and agree that defendant Tureck's responsive pleading may be
9 filed no later than July 22, 2011. The parties are not making this request for any improper
10 purpose, including undue delay. Moreover, as noted above, neither party would suffer any
11 prejudice as the parties have stipulated to this request.

12 SO STIPULATED.

13 Respectfully submitted:

14 ZACH COWAN, City Attorney
15 KRISTY VAN HERICK, Deputy City Attorney

16 Dated: July 6, 2011.

17 By: _____ /s/

18 KRISTY VAN HERICK, Deputy City Attorney
19 Attorneys for Defendants City of Berkeley and
20 Harvey Tureck

21 Respectfully submitted:

22 Dated: July 6, 2011.

23 By: _____ /s/

24 MARK HAINES
25 Plaintiff Appearing *Pro Se*

26 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

27 Dated: _____ 7/7/11 _____

