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 15 CONTRA COSTA COUNTY

16 **UNITED STATES DISTRICT COURT**

17 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

19 RETIREE SUPPORT GROUP OF  
 20 CONTRA COSTA COUNTY,

21 Plaintiff,

22 v.

23 CONTRA COSTA COUNTY,

24 Defendant.  
 25

**No. C12-00944 (JSW)**

**JOINT STIPULATION REQUESTING  
 CONTINUANCE OF CASE  
 MANAGEMENT CONFERENCE,  
 WITH [~~PROPOSED~~] ORDER**

**(N.D. Local Rule 6-1(a))**

26  
 27 Defendant Contra Costa County (“County” or “Defendant”) and Plaintiff Retiree Support  
 28 Group of Contra Costa County (“Plaintiff”) (together, "the Parties") are calendared to appear for

1 the Initial Case Management Conference ("CMC") on February 1, 2013;

2 WHEREAS, pursuant to the Court's Order of August 6, 2012 (Dkt. 37), the following  
3 deadlines apply to the filing of the Second Amended Complaint, responsive pleadings and any  
4 subsequent briefing schedule, including:

5 a. Plaintiff will file its amended complaint within sixty (60) days after completion  
6 of the County's production or November 30, 2012;

7 c. Because of the holidays and possible furloughs, the County will file its  
8 responsive pleading by January 9, 2013;

9 d. If the County files a motion to dismiss, Plaintiff's opposition brief will be filed  
10 twenty-five (25) days after the County files the motion; and

11 e. The County's reply brief will be filed eleven (11) days after the filing of Plaintiff's  
12 opposition brief;

13 WHEREAS, Plaintiff filed its Second Amended Complaint on November 30, 2012 (Dkt.  
14 43);

15 WHEREAS, Defendant filed its Motion to Dismiss the Second Amended Complaint (the  
16 "Motion to Dismiss") on January 9, 2012 (Dkt. 44-46);

17 WHEREAS, briefing on the Motion to Dismiss will not be complete until February 15,  
18 2013 (Dkt. 37);

19 WHEREAS, the first available hearing date provided by the Court for hearing on the  
20 Motion to Dismiss is March 29, 2013; and

21 WHEREAS, for reasons of judicial economy based on the deadlines set forth herein, there  
22 is good cause for the Court to continue the Case Management Conference scheduled for February  
23 1, 2013, until after the Motion to Dismiss the Second Amended Complaint is decided;

24 NOW THEREFORE, the Parties, by and through their respective counsel of record, hereby  
25 stipulate and agree as follows, and respectfully ask the Court to enter the terms of this stipulation  
26 as its Order, subject to amendment for good cause:

27 For reasons of judicial economy, the Parties agree the Case Management Conference  
28 scheduled for February 1, 2013, should be continued to a date to be set by the Court after the

1 Motion to Dismiss is decided.

2 **IT IS SO STIPULATED AND REQUESTED BY** the Parties.

3 HANSON BRIDGETT LLP

4 DATED: January 17, 2013

5  
6 By: /s/  
7 RAYMOND F. LYNCH  
8 Attorneys for Defendant  
9 CONTRA COSTA COUNTY

10 DATED: January 17, 2013

11 LEWIS, FEINBERG, LEE, RENAHER &  
12 JACKSON, P.C.  
13  
14 By: /s/  
15 JEFFREY LEWIS  
16 Attorneys for Plaintiff  
17 RETIREE SUPPORT GROUP OF CONTRA  
18 COSTA COUNTY

19 **ORDER**

20 **PURSUANT TO THE FOREGOING STIPULATION AND REQUEST**, and for good cause  
21 shown, the Court resets the Case Management Conference to April 19, 2013.

22 **IT IS SO ORDERED.**

23 Dated: January 22, 2013

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HON. JEFFREY S. WHITE  
United States Judge