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1 Gregory M. Fox, State Bar No. 070876 BERTRAND, FOX & ELLIOT 2 The Waterfront Building 2749 Hyde Street 3 San Francisco, California 94109 Telephone: (415) 353-0999 4 Facsimile: (415) 353-0990 5 Attorneys for Defendants CITY OF ANTIOCH, LOREN BLEDSOE and ALLAN CANTANDO 6 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 11 LUIS A. ALVAREZ-ORELLANA, Case No. C12-4693 JSC 12 Plaintiff, STIPULATION AND [PROPOSED] ORDER CONTINUING CASE MANAGEMENT 13 **CONFERENCE and RELATED RULE 26** DISCLOSURES PENDING APPEARANCES OF CITY OF ANTIOCH; LOREN BLEDSOE, 14 ALL NAMED DEFENDANTS, FILING OF THE individually and in his capacity as a police AMENDED COMPLAINT AND FILING OF officer for the CITY OF ANTIOCH; ALLAN 15 RESPONSIVE PLEADINGS THEREIN CANTANDO, individually and in his official capacity as chief of police for the city of 16 Antioch; DAVID O. LIVINGSTON, individually and in his official capacity as 17 Sheriff for the County of Contra Costa; LREOY 18 D. BACA, individually and in his official capacity as Sheriff for the County Los Angeles; 19 L. WALKER, individually and in his official capacity as Clerk for the Los Angeles County 20 Superior Court; C. NEDAR, individually and in his official capacity as Clerk for the Los 21 Angeles County Superior Court; LOS ANGELES SUPERIOR COURT CLERK'S 22 OFFICE, in its official capacity; and DOES 1-30, 23 Defendants. 24 25 This matter is currently scheduled for the Initial Case Management Conference on Thursday, 26 April 18 and plaintiff is also required to file his amended complaint on that same date (see Order on 27 Stipulation dated March 4, 2013 Docket No. 38). Plaintiff has attempted service on defendant David

O. Livingston, Sheriff of Contra Costa County. Counsel from the Contra Costa County Counsel's

STIPULATION CONTINUING CASE MANAGEMENT CONFERENCE

Office have made arrangements with plaintiff's counsel so that County Counsel for Contra Costa County may accept service for defendant Livingston of the amended complaint and said service of the amended complaint will take place sometime after the filing of the amended complaint on or before April 18, 2013.

Given not all parties have yet formally appeared in the above captioned matter, and it may take another 30 - 45 days after April 18 for all appearances to be filed in the above captioned matter, the attorneys for the parties presently appearing agree it would be a more efficient use of Court resources and the time and costs for the parties that the Case Management Conference be continued again from Thursday April 18 to Thursday June 27 so that all named defendants who have been served and not dismissed may appear and participate in said CMC.

Therefore the plaintiff and Antioch defendants and defendant Baca Stipulate and respectfully request that this Court continue the current date for the Initial Case Management Conference from Thursday, April 18 to Thursday, June 27, 2013 at 130 pm or to that future date most convenient for the Court.

A joint CMC statement to be filed on or before Thursday June 20, 2013.

The parties further agree that at the time of the Case Management Conference hearing, the date of Rule 26 (f) disclosures and ADR process should be re-scheduled to a new date mutually convenient to all parties and based on the results of the Case Management Conference all of which will help frame the issues.

Based on this good cause the parties, acting by and through their respective legal counsel, stipulate and request that the Court order the stipulation of the parties and that the initial Case Management Conference date be continued from April 18 to June 27, 2013. A joint Case Management Conference Statement to be filed Thursday June 20, 2013. The date for Rule 26 (f) disclosures; and the deadlines for filing the ADR Certification, Stipulation to ADR Process or Notice of Need for ADR Phone Conference, to be set by the Court at the initial Case Management Conference.

1	Dated: April 4, 2013. Law Offices of Enrique Ramirez
2	
3	By:
4	Enrique Ramirez
5	
6	Dated: April 4, 2013. BERTRAND, FOX & ELLIOT
7	
8	By:
9	Gregory M. Fox Attorneys for Defendants
10	CITY OF ANTIOCH, LOREN BLEDSOE and ALLAN CANTANDO
11	
12	Dated: April 4, 2013. LOS ANGELES COUNTY COUNSEL
13	/s/
14	By:
15	Jonathan McCaverty, Senior Deputy County Counsel
16	Attorney for Defendant Leroy D. Baca
17	ATTORNEY ATTESTATION
18	I hereby attest that I have on file all holograph signatures for any signatures indicated by a
19	conformed signature ("/s/") within this E-filed document.
20	
21	Dated: April 4, 2013  Gregory M. Fox
22	ORDER
23	
24   25	Good cause appearing the Stipulation is So Ordered. The initial Case Management Conference at 9:00 a.m.
26	date is continued from April 18 to June 27, 2013 or A joint Case Management Conference
27	Statement to be filed Thursday June 20, 2013 or The date for Rule 26 (f) disclosures; and
28	the deadlines for filing the ADR Certification, Stipulation to ADR Process or Notice of Need for ADR
	STIPULATION CONTINUING CASE MANAGEMENT CONFERENCE

Phone Conference, to be set by the Court at the initial Case Management Conference.

Dated: April 12, 2013

By: Court IT IS SO ORDERED Judge Edward M. Chen