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ADDITIONAL COUNSEL AND PARTIES , SEE NEXT
PAGE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FORREST BLOCKER, individually and as
Guardian Ad Litem for her minor child,
M.B.,

Plaintiffs,

vs.

COUNTY OF CONTRA COSTA, LORI
CASTILLO, MEGHAN SCHULZE,
NICOLE GREMILLION, LYNDA
EHRICH, MARY LOGGER, CITY OF
ANTIOCH, TREVOR SCHNITZIUS,
KRISTOPHER KINT, OFFICER WHITE,
PAULA MCEVOY, and Does 1-10,
inclusive,

Defendants.

Case No. CV12-05597 CRB

**STIPULATION AND ORDER TO
CONTINUE CASE MANAGEMENT
CONFERENCE**

CMC: 6/14/13
Time: 8:30 a.m.
Courtroom 6, 17th floor
450 Golden Gate, San Francisco, Ca.

Hon. Charles R. Breyer

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14 COUNTY OF CONTRA COSTA, MEGHAN SCHULZE,
NICOLE GREMILLION, AND LORI CASTILLO

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1 All parties to this action, believing that good cause exists, stipulate and agree, by and
2 through their respective counsel, as follows:

3 1. The parties have exchanged written discovery and document production requests
4 following the initial case management conference. However, due to several obstacles, especially
5 the Contra Costa County Superior Court's process involving the release of the juvenile
6 dependency court records and the parties' efforts to agree upon and obtain a stipulated protective
7 order before exchanging confidential documents, the parties have not been able to produce any
8 documents in this case until this week.

9 2. Specifically, obtaining the juvenile dependency court records from the Contra
10 Costa County Superior Court has been a particularly challenging process. Even though a request
11 for the release of the juvenile case file was submitted on January 17th, 2013, the records were not
12 made available by the court until May 28, 2013. The delay was largely due to the number of such
13 requests in the Contra Costa County Superior Court and the fact that a new judge, who was
14 unfamiliar with the process, had been assigned to deal with the requests at the beginning of this
15 year.

16 3. In addition, due to the confidential nature of the underlying juvenile proceedings
17 and the involvement of a minor plaintiff, the parties wanted to ensure that a protective order was
18 in place before exchanging any confidential documents. The Court signed the parties' stipulated
19 protective order on May 24, 2013. (See Doc. # 59, filed May 24, 2013).

20 4. Absent the production of any documents, the parties have not taken any
21 depositions in this case to date. However, now that the juvenile case file has been released and
22 the Court has signed the protective order, the parties are in the process of producing documents in
23 this case. Once the documents have been exchanged, the parties will need sufficient time to
24 evaluate the information and will then schedule the depositions of the involved parties. The
25 parties believe that they will be in a position to schedule the depositions within the next 45-60
26 days, prior to the settlement conference with Hon. Magistrate Judge Maria Elena James.

27 5. A Settlement Conference has been scheduled with Magistrate Judge Maria-Elena
28 James on July 12, 2013.

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6. Based on the foregoing, the parties wish to continue to Case Management Conference, which is currently set for June 14, 2013, for 60 days to allow the parties sufficient time to conduct their discovery and to evaluate the case. The parties believe that good cause exists for such reasonable continuation to save judicial time, resources, fees and costs.

7. Therefore, the parties seek the Court's approval to continue the Case Management Conference, currently set for June 14, 2013, for 60 days to at date and time chosen by the Court at the Court's convenience and availability.

Respectfully submitted,

Date: May 30, 2013

/s/ Powell, Robert
ROBERT POWELL
Attorney for Plaintiffs

Date: May 30, 2013

/s/ Fitzgerald, James
JAMES V. FITZGERALD, III
Attorney for City of Antioch
Defendants

Date: May 30, 2013

/s/ Rehon, Peter
PETER REHON
Attorney for M. Logger
And L. Ehrich

Date: May 30, 2013

/s/ Amenta, Janice
JANICE AMENTA
Attorney for County of
Contra Costa Defendants

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ORDER

PURSUANT TO THE FOREGOING STIPULATION, THE COURT ORDERS AS FOLLOWS:

The Case Management Conference, currently set for June 14, 2013, is continued to August 16, 2013, 2013 at 8:30 a.m..

IT IS SO ORDERED

Dated: June 3, 2013

By: _____

Honorable Charles R. Breyer
United States District Court

