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14 Attorneys for Defendants
 15 GREGORY D. LEWIS; J. HALLOCK; K. MCGUYER;
 MATTHEW CATE AND T.A. WOOD

18 UNITED STATES DISTRICT COURT
 19 NORTHERN DISTRICT OF CALIFORNIA

21 RAYMOND J. MANZANILLO,

22 Plaintiff,

23 v.

24 GREGORY D. LEWIS, et al.,

25 Defendants.

Case No. 3:12-cv-05983-JST

**STIPULATION AND ~~PROPOSED~~
 ORDER TO STAY THIS ACTION FOR A
 PERIOD OF FOUR WEEKS AND TO
 CONTINUE THE CASE MANAGEMENT
 CONFERENCE SCHEDULED FOR
 JULY 8, 2015**

1 Pursuant to Civil Local Rule 6-2, Plaintiff Raymond J. Manzanillo and Defendants N. Brown,
2 Gregory D. Lewis, J. Hallock, K. McGuyer, Matthew Cate, and T.A. Wood (collectively “the Parties”)
3 by and through their respective counsel hereby stipulate and request that the Court (1) stay this action
4 for a period of four weeks from the date of the Court’s Order granting this request; (2) continue the case
5 management conference currently scheduled for July 8, 2015, to a date convenient for the Court that
6 follows the end of the stay; and (3) continue the current July 1, 2015, deadline for the Parties to file case
7 management statements.

8 Plaintiff’s counsel is currently working with personnel at Corcoran State Prison to gain access to
9 Mr. Manzanillo. That process has taken longer than expected, and Plaintiff’s counsel has not yet been
10 able to meet or speak with Mr. Manzanillo; nor has counsel yet been able to secure copies of documents
11 produced to Mr. Manzanillo in discovery thus far. The proposed stay will require the Court to
12 reschedule the July 8 case management conference and extend the deadline for the Parties to file a case
13 management statement, but it should not otherwise have a significant effect on the schedule for this case.
14 Moreover, the requested stay will preserve both the Parties’ and the Court’s resources, as it will allow
15 Plaintiff’s counsel the opportunity to confer with Mr. Manzanillo and review the materials already
16 produced by Defendants before participating in a case management conference or any additional
17 litigation practice.

18 **IT IS SO STIPULATED.**

19
20 DATED: June 24, 2015

Respectfully submitted,

SEYFARTH SHAW LLP

23 By: /s/ Michael A. Wahlander

24 Francis J. Ortman III
25 Aryeh M. Hersher
Jason M. Allen
Michael A. Wahlander

26 Attorneys for Plaintiff
27 RAYMOND J. MANZANILLO
28

1 DATED: June 24, 2015

Respectfully submitted,
MCNAMARA LAW FIRM

4 By: /s/ William Lee McCaslin
Peter Jon Hirsig
William Lee McCaslin

6 Attorneys for Defendant
7 N. BROWN

9 DATED: June 24, 2015

Respectfully submitted,
CALIFORNIA STATE ATTORNEY
GENERAL'S OFFICE

13 By: /s/ Michael James Quinn
Michael James Quinn

14 Attorneys for Defendants
15 GREGORY D. LEWIS; J. HALLOCK;
16 K. MCGUYER; MATTHEW CATE AND
17 T.A. WOOD

19 **ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)**

20 I, Michael A. Wahlander, attest that concurrence in the filing of this stipulation has been
21 obtained from the signatories, William Lee McCaslin and Michael James Quinn, counsel for
22 Defendants.

23 Executed this 24th day of June, 2015, in San Francisco, CA.

25 /s/ Michael A. Wahlander
Michael A. Wahlander


1 **[PROPOSED] ORDER**

2 Based on the Parties' stipulation and good cause appearing, the Court orders as follows:

3 1. All further proceedings are STAYED for four weeks from the date of this order.

4 2. The Case Management Conference currently scheduled for July 8, 2015, is hereby
5 rescheduled to August 19, and the deadline for the Parties' to file Case Management Statements,
6 currently July 1, 2015, will be rescheduled to August 7, 2015.

7
8 DATED: June 26, 2015


9 HONORABLE JON S. TIGAR
10 United States District Judge