

1 SEYFARTH SHAW LLP
 Francis J. Ortman III (SBN 213202); fortman@seyfarth.com
 2 Aryeh M. Hersher (SBN 260321); ahersher@seyfarth.com
 Jason M. Allen (SBN 284432); jmallen@seyfarth.com
 3 Michael A. Wahlander (SBN 260781); mwahlander@seyfarth.com
 560 Mission Street, 31st Floor, San Francisco, California 94105
 4 Telephone: (415) 397-2823 / Facsimile: (415) 397-8549

5 Attorneys for Plaintiff
 RAYMOND J. MANZANILLO

6 MCNAMARA LAW FIRM
 7 Peter Jon Hirsig (SBN 197993); Peter.hirsig@mcnamaralaw.com
 William Lee McCaslin (SBN 249976);
 8 William.McCaslin@McNamaraLaw.com
 639 Kentucky Street, First Floor, Fairfield, CA 94533
 9 Telephone: (707) 427-3998 / Facsimile: (707) 427-0268

10 Attorneys for Defendant
 N. BROWN

11 Michael James Quinn (SBN 209542); Michael.Quinn@doj.ca.gov
 12 California State Attorney General's Office
 Correctional Law Section
 13 455 Golden Gate Avenue, Suite 11000,
 San Francisco, CA 94102-7004
 14 Telephone: (415) 703-5726 / Facsimile: (415) 703-5843

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

17
 18 UNITED STATES DISTRICT COURT
 19 NORTHERN DISTRICT OF CALIFORNIA
 20

21 RAYMOND J. MANZANILLO,

22 Plaintiff,

23 v.

24 GREGORY D. LEWIS, et al.,

25 Defendants.
 26
 27

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
 AUGUST 19, 2015**

1
2 Pursuant to Civil Local Rule 6-2, Plaintiff Raymond J. Manzanillo and Defendants N. Brown,
3 Gregory D. Lewis, J. Hallock, K. McGuyer, Matthew Cate, and T.A. Wood (collectively “the Parties”)
4 by and through their respective counsel hereby stipulate and request that the Court (1) stay this action
5 for a period of four weeks from the date of the Court’s Order granting this request; (2) continue the case
6 management conference currently scheduled for August 19, 2015, to a date convenient for the Court that
7 follows the end of the stay; and (3) continue the current August 7, 2015, deadline for the Parties to file
8 case management statement.

9 Plaintiff’s counsel only recently gained access to visit Mr. Manzanillo in Corcoran State Prison
10 and to documents in Mr. Manzanillo’s possession. Plaintiff’s counsel is currently working with counsel
11 for the Defendants to ensure that Plaintiff’s counsel has access to all documents exchanged by the
12 Parties in discovery thus far. The proposed stay will require the Court to reschedule the August 19 case
13 management conference and extend the deadline for the Parties to file a case management statement, but
14 it should not otherwise have a significant effect on the schedule for this case. Moreover, the requested
15 stay will preserve both the Parties’ and the Court’s resources, as it will allow Plaintiff’s counsel the
16 opportunity to secure and review the materials already produced by Defendants before participating in a
17 case management conference or any additional litigation practice.

18 **IT IS SO STIPULATED.**

19
20 DATED: August 5, 2015

Respectfully submitted,

SEYFARTH SHAW LLP

23 By: /s/ Michael A. Wahlander

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

28 Attorneys for Plaintiff
RAYMOND J. MANZANILLO

1 DATED: August 5, 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: August 5, 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

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

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

22 Executed this 5th day of August 2015, in San Francisco, CA.

24 /s/ Michael A. Wahlander
25 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 August 19, 2015, and the
5 deadline for the Parties' to file Case Management Statements, currently August 7, 2015, will be
6 rescheduled to dates following the end of the stay.

7
8 DATED: August 6, 2015

