

1 Thomas F. Bertrand, State Bar No. 056560  
 Michael C. Wenzel, State Bar No. 215388  
 2 BERTRAND, FOX & ELLIOT  
 3 The Waterfront Building  
 2749 Hyde Street  
 4 San Francisco, California 94109  
 Telephone: (415) 353-0999  
 5 Facsimile: (415) 353-0990  
 Email: [mwenzel@bfesf.com](mailto:mwenzel@bfesf.com)

6 Attorneys for Defendant  
 7 R. BETZ

8  
 9 JOHN L. BURRIS, State Bar No. 69888  
 DEWITT M. LACY, State Bar No. 258789  
 10 LAW OFFICES OF JOHN L. BURRIS  
 Airport Corporate Centre  
 11 7677 Oakport Street, Suite 1120  
 Oakland, California 94621  
 12 Telephone: (510) 839-5200  
 Facsimile: (510) 839-3882  
 13 Email: [john.burris@johnburrislaw.com](mailto:john.burris@johnburrislaw.com)  
 14 Attorneys for Plaintiffs  
 15 MARCELLUS GREEN; JENNIVIE GREEN;  
 JENNIVIE GREEN Guardian ad litem for C.G.

17 UNITED STATES DISTRICT COURT  
 18 NORTHERN DISTRICT OF CALIFORNIA

20 MARCELLUS GREEN; JENNIVIE GREEN;  
 21 JENNIVIE GREEN Guardian ad litem for C.G.;

22 Plaintiffs,

23 v.

24 DEPUTY R. BETZ, individually and in his  
 25 capacity as a Deputy Sheriff for the  
 COUNTY OF ALAMEDA; DOES 1-10,  
 26 inclusive; individually and in their capacities  
 as DEPUTY SHERIFFS for COUNTY OF  
 27 ALAMEDA,

28 Defendants.

Case No. 3:13-cv-01671-MMC

**STIPULATED REQUEST TO EXTEND TIME TO  
 RESPOND TO SECOND AMENDED  
 COMPLAINT; ~~PROPOSED~~ ORDER**

1 The parties in the above-captioned case, by and through their counsel of record, hereby represent  
2 to the Court as follows:

3 1. On April 12, 2013, Plaintiff filed the Complaint initiating the above-captioned action  
4 against the County of Alameda and Deputy R. Betz.

5 2. On October 11, 2013, plaintiff filed a second amended complaint in this action. The  
6 response to that complaint is due October 25, 2013.

7 3. Counsel for defendant will be out of the country on vacation from October 18 through  
8 October 30, 2013.

9 4. The parties therefore stipulate to extend the time for defendant to respond to the Second  
10 Complaint through and including November 8, 2013.

11 5. This extension will not alter any event or deadline already fixed by Court order.  
12

13 DATED: October 25, 2013

LAW OFFICES OF JOHN L. BURRIS

14 By: /s/ Dewitt Lacy

15 John L. Burris

16 DeWitt Lacy

17 Attorneys for Plaintiff

MARCELLUS GREEN, JENNIVIE GREEN,

JENNIVIE GREEN guardian ad litem for C.G.

18  
19 Dated: October 25, 2013

BERTRAND, FOX & ELLIOT

20 By: /s/ Michael C. Wenzel

21 Michael C. Wenzel

22 Attorneys for Defendants

and R. BETZ

23 **[PROPOSED] ORDER**

24 Upon the foregoing Stipulation, and for good cause shown, IT IS ORDERED that the time for  
25 Defendant to respond to plaintiff's Second Amended Complaint shall be extended to November 8, 2013.

26  
27 Dated: October 25, 2013

28   
Honorable Maxine M. Chesney

UNITED STATES SENIOR DISTRICT JUDGE