

1 Michael W. Melendez (SBN 125895)
 Teri Mae Rutledge (SBN 261229)
 2 COZEN O'CONNOR
 101 Montgomery Street, Suite 1400
 3 San Francisco, CA 94104
 Tel: 415.644.0914
 4 Fax: 415.644.0978
 Email: mmelendez@cozen.com
 5 trutledge@cozen.com

6 Attorneys for Plaintiff
 JOHNDELL HENDERSON
 7

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

10
 11 JOHNDELL HENDERSON,

12 Plaintiff,

13 v.

14 CAROLYN HERNANDEZ; W.L. MUNIZ, et al.
 15 ,

16 Defendants.

Case No.: 3:14-cv-01857-JST

**JOINT STIPULATION TO CONTINUE
 CASE MANAGEMENT CONFERENCE
 21 DAYS, TO 05/30/2018**

Judge: Hon. Jon S. Tigar

17
 18 Because newly retained counsel for the plaintiff will be making their initial contact with
 19 plaintiff on Friday, April 27, 2018, the parties stipulate to a short, 21-day continuance of the case
 20 management conference, currently scheduled for May 9, 2018, to May 30, 2018.

21 **RECITALS**

22 1. On March 5, 2018, the Court appointed counsel for the plaintiff, Johndell Henderson,
 23 and set a case management conference date of May 9, 2018 at 2:00 pm. (Order, Mar. 5, 2018, ECF
 24 No. 117.)

25 2. Thereafter, appointed counsel for Mr. Henderson have written to him, sending him a
 26 retention agreement and requesting contact via telephone and by in-person visit.

27 3. Counsel for Mr. Henderson also began the process to obtain authorization from his
 28 institution for an in-person visit.

1 4. Thereafter, on April 20, 2018, counsel for Mr. Henderson were approved for an in-
2 person visit with plaintiff him on April 27, 2018.

3 5. Thereafter, on April 24, 2018, counsel for Mr. Henderson received his signed
4 retention agreement.

5 6. During this period, counsel for the defendants were also communicating with the
6 plaintiff's counsel respecting agreements the parties may reach regarding discovery and other issues.
7 Counsel believe they will confer early next week (April 30-May 4).

8 7. Counsel for plaintiff believe that consulting with Mr. Henderson is necessary for a
9 productive case management conference, and wish to allow for any contingencies that might arise
10 respecting their scheduled visit on April 27, 2018 (such as a lockdown or any other circumstance
11 that would necessitate rescheduling the visit) to ensure it occurs before the conference and the joint
12 statement deadline a week prior.

13 **STIPULATION**

14 Because counsel for Mr. Henderson require additional time to make contact with their newly
15 retained client in order for the case management conference to be productive, and wish a short
16 amount of time to address any contingencies that may arise regarding their initial conference with
17 their client on April 27, 2018, the plaintiff respectfully requests, and the defendants agree, that the
18 case management conference be continued 21 days to May 30 at 2:00 p.m., or to a date thereafter
19 most convenient to the Court.

20 Dated: April 25, 2018

COZEN O'CONNOR

21 By: /s/ Theresa Mae Rutledge

22 Michael W. Melendez
23 Theresa Mae Rutledge
24 Attorneys for Plaintiff
JOHNDELL HENDERSON

25 Dated: April 25, 2018

OFFICE OF THE ATTORNEY GENERAL

26 By: /s/ Jeffrey T. Fisher

27 Ian M. Ellis
28 Jeffrey T. Fisher
Attorneys for Defendants
CAROLYN HERNANDEZ and W.L. MUNIZ

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ATTESTATION UNDER NORTHERN DISTRICT OF CALIFORNIA, CIVIL LOCAL RULE 5-1(i)

I, Theresa Mae Rutledge, attest and declare as follows:

Concurrence in the filing of this document has been obtained from all signatories, and shall serve in lieu of their signatures on the document.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Signed on April 25, 2018 in San Francisco, California.

By: /s/ Theresa Mae Rutledge

Theresa Mae Rutledge
Attorneys for Plaintiff
JOHNDELL HENDERSON

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

PURSUANT TO STIPULATION, AND BASED ON GOOD CAUSE, THE CASE
MANAGEMENT CONFERENCE IS CONTINUED 21 DAYS TO MAY 30, 2018, AT 2:00 P.M.

IT IS SO ORDERED.

Dated: April 26, 2018



THE HONORABLE JON S. TIGAR
UNITED STATE DISTRICT COURT JUDGE
NORTHERN DISTRICT OF CALIFORNIA