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5 Attorneys for Plaintiffs
 6 RAUL BARAJAS
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8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION
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12 RAUL BARAJAS and
 ELVA BARAJAS

13 Plaintiffs,
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15 v.

16 CITY OF ROHNERT PARK, a municipal
 corporation; and Jacy Tatum, David Rodriquez
 and Matthew Snodgrass, officers with the City of
 17 Rohnert Park Police Department,

18 Defendants.
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Case No. 3:14-cv-05157 MEJ

**STIPULATION AND ~~PROPOSED~~
 ORDER REGARDING EXTENDING
 ADR CONFERENCE DEADLINE**

Complaint filed: November 21, 2014

20 Plaintiffs Raul Barajas and Elva Barajas (“Plaintiffs”) and Defendants City of Rohnert
 Park, Jacy Tatum, David Rodriquez and Matthew Snodgrass (“Defendants”), through their
 21 undersigned counsel, hereby stipulate as follows:

22 WHEREAS, the Court-appointed mediator, William Herbert sent a correspondence on
 23 March 25, 2015 stating that the target date to complete mediation was May 22, 2015;

24 WHEREAS, on April 8, 2015, Plaintiffs and Defendants discussed mediation with Mr.
 25 Hebert;

26 WHEREAS, Defendants indicated during that telephone conference that it was going to
 27 file a motion for summary judgement;
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1 WHEREAS, Plaintiffs and Defendants agreed that it would not be fruitful to have a
2 mediation conference before the court's ruling on the pending summary judgement motion; and

3 WHEREAS, the parties agree that the ADR deadline should be extended to 45 (forty-five)
4 days after the Court rules on Defendants' motion for summary judgement;

5 THE PARTIES HEREBY STIPULATE, subject to the approval of the Court, that the
6 ADR deadline will be 45 (forty-five) days after the Court rules on Defendants' motion for
7 summary judgement.

8 **IT IS SO STIPULATED.**

9 Dated: June 25, 2015

ARTURO J. GONZÁLEZ
ANTONIO L. INGRAM II
MORRISON & FOERSTER LLP

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12 By: /s/ Arturo J. González
ARTURO J. GONZÁLEZ

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14 Attorney for Raul Barajas and Elva Barajas

15 Dated: June 25, 2015

SCOTT LEWIS
DAVID F. BEACH
PERRY, JOHNSON, ANDERSON, MILLER &
MOSKOWITZ LLP

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19 By: /s/ Scott Lewis
SCOTT LEWIS

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21 Attorney for City of Rohnert Park

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23 **IT IS SO ORDERED.**

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25
26 Dated: June 25, 2015, 2015


27 Hon. Maria-Elena James
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