1 MELINDA HAAG (CABN 132612) United States Attorney 2 ALEX G. TSE (CABN 152348) 3 Chief, Civil Division 4 MARK R. CONRAD (CABN 255667) Assistant United States Attorney 5 450 Golden Gate Avenue, Box 36055 6 San Francisco, California 94102-3495 Telephone: (415) 436-7025 7 Fax: (415) 436-6748 mark.conrad@usdoj.gov 8 Attorneys for Defendant 9 10 Clayeo C. Arnold (SBN 65070) Anthony M. Ontiveros (SBN 152758) 11 Kiersta D. Perlee (SBN 187675) CLAYEO C. ARNOLD 12 A PROFESSIONAL LAW CORPORATION 865 Howe Avenue 13 Sacramento, CA 95825 Telephone: (916) 924-3100 14 Fax: (916) 924-1829 Email: aontiveros@justice4you.com 15 Email: kperlee@justice4you.com 16 UNITED STATES DISTRICT COURT 17 NORTHERN DISTRICT OF CALIFORNIA 18 SAN FRANCISCO DIVISION 19 20 SAMARN OLSEN and) CASE NO. C 14-05601 SI 21 NEOLANI OLSEN-RODRIGUEZ,) STIPULATION AND [PROPOSED] 22 Plaintiffs,) ORDER TO EXTEND DEADLINE FOR) DEFENDANT UNITED STATES OF 23 AMERICA TO RESPOND TO THE V.) COMPLAINT AND TO CONTINUE 24 UNITED STATES OF AMERICA, INITIAL CASE MANAGEMENT **CONFERENCE** 25 Defendant. 26 27 28 STIP TO CONT. CMC AND RESPONSE DEADLINE Case No. C 14-05601 SI

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Olsen et al V. United States

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WHEREAS, Plaintiffs Samarn Olsen and Neolani Olsen-Rodriguez filed the above-captioned action on December 23, 2014, see Dkt. Nos. 1 & 2; WHEREAS, Plaintiffs have served a copy of the Complaint for Wrongful Death on the

Department of Justice in Washington, D.C., and the United States Attorney's Office for the Northern

WHEREAS, Defendant United States of America, which is specially appearing in connection with the matters addressed by this stipulation, asserts that service upon the United States has not been completed as required under Federal Rule of Civil Procedure 4(i);

WHEREAS, undersigned counsel for Defendant United States of America has a scheduling conflict with the Initial Case Management Conference that was automatically set by the Court in this matter for March 27, 2015;

WHEREAS, to avoid litigation over the adequacy of service upon the United States, and to accommodate the schedules of undersigned counsel for Defendant United States of America;

NOW, THEREFORE, by and through their undersigned counsel in this action, the parties hereby stipulate and agree as follows:

The deadline for Defendant United States of America to respond to the Complaint shall be extended until and including April 15, 2015. The Initial Case Management Conference set in this matter shall be continued until Friday, May 1, 2015, at 2:30 p.m. Pursuant to the Standing Order for All Judges of the Northern District of California dated August 25, 2014, the parties shall file a Joint Case Management Statement not later than Friday, April 24, 2015.

Respectfully submitted,

DATED: March 5, 2015

MELINDA HAAG United States Attorney

/s/ Mark R. Conrad

Assistant United States Attorney

District of California in San Francisco, California;

1 2	DATED: March 5, 2015	CLAYEO C. ARNOLD A Professional Law Corporation
3		
4		/s/ Anthony M. Ontiveros
5		ANTHONY M. ONTIVEROS Attorney for Plaintiffs
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7	IT IS SO ORDERED.	
8	Date: <u>3/9/2015</u>	Suran Delaton
9		HON. SUSAN ILLSTON United States District Court Judge
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