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11 Attorneys for Defendants

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 MYRAH MARTINEZ, et al.,

17 Plaintiffs,

18 vs.

19 COUNTY OF SONOMA, et al.,

20 Defendants.

Case No. 3:15-cv-01953-JST

**STIPULATION TO CONTINUE CASE
MANAGEMENT CONFERENCE AND
ASSOCIATED DEADLINES;
[PROPOSED] ORDER**

21 WHEREAS, the Court’s currently-scheduled Case Management Conference in the above-
22 captioned is set for August 5, 2015. ECF No. 9. Dates associated with the Case Management Conference
23 include the parties’ obligation to meet and confer by July 15, 2015, pursuant to Federal Rule of Civil
24 Procedure 26(f)(1); the parties’ obligation to exchange initial disclosures within 14 days of their meet and
25 confer, pursuant to Federal Rule of Civil Procedure 26(a)(C); and the parties’ obligation to file a Joint
26 Case Management Statement by July 27, 2015.

27 WHEREAS, the pendency of Defendants’ motion to dismiss (ECF No. 19) and Plaintiffs’
28 counsels’ unavailability during the month of July creates good cause to delay the above-referenced dates

1 and deadlines, the parties hereby STIPULATE to the following:

- 2 1. the Court's rescheduling of the Case Management Conference to September 2, 2015;
- 3 2. the parties' obligation to meet and confer by August 12, 2015, pursuant to Federal Rule of
4 Civil Procedure 26(f)(1);
- 5 3. the parties' obligation to exchange initial disclosures within 14 days of their meet and
6 confer, pursuant to Federal Rule of Civil Procedure 26(a)(C); and
- 7 4. the parties' obligation to file a Joint Case Management Statement by August 24, 2015.

8 Dated: July 6, 2015

Respectfully Submitted,

9 LAW OFFICE OF MARK E. MERIN

10 /s/ Mark E. Merin

11 By: _____
12 Mark E. Merin

13 Attorneys for Plaintiffs
14 MYRAH MARTINEZ, KITARA MCCRAY,
15 MADISON MARLENE MARVEL, STAR SMITH,
and R.M.

16 Dated: July 6, 2015

Respectfully Submitted,

17 SENNEFF FREEMAN & BLUESTONE, LLP

18 /s/ Bonnie A. Freeman
19 (as authorized on July 6, 2015)

20 By: _____
21 Bonnie A. Freeman

22 Attorneys for Defendants County of Sonoma (also sued as
23 Sonoma County Human Services Department and Sonoma
24 County Family, Youth and Children's Services), Jerry
25 Dunn, Nick Honey and Stacie Kabour
26
27
28

1 **[PROPOSED] ORDER**

2 Pursuant to the parties' stipulation, the Court hereby ORDERS the following:

- 3 1. the Case Management Conference is rescheduled from August 5, 2015 to September 2,
4 2015;
- 5 2. the parties are obligated to meet and confer by August 12, 2015, pursuant to Federal Rule
6 of Civil Procedure 26(f)(1);
- 7 3. the parties are obligated to exchange initial disclosures within 14 days of their meet and
8 confer, pursuant to Federal Rule of Civil Procedure 26(a)(C); and
- 9 4. the parties are obligated to file a Joint Case Management Statement by August 24, 2015.

10 IT IS SO ORDERED.

11 Dated: July 8, 2015

