Andrew C. Schwartz (State Bar No. 64578) 1 CASPER, MEADOWS, SCHWARTZ & COOK A Professional Corporation 2 California Plaza 2121 North California Blvd., Suite 1020 3 Walnut Creek, California 94596 Telephone: (925) 947-1147 4 Facsimile: (925) 947-1131 5 Attorneys for Plaintiffs 6 UNITED STATES DISTRICT COURT 7 8 NORTHERN DISTRICT OF CALIFORNIA 9 MARCUS HURT, CARLY MAGNUS and No. C15-05223 JCS 10 CREIGHTON HURT, STIPULATION TO EXTEND 11 TIME TO RESPOND TO Plaintiffs. **COMPLAINT** 12 v. [Civil L.R. 6-1(a)] 13 CONTRA COSTA COUNTY SERGEANT 14 DAVID ADAMS, CONTRA COSTA Crtrm: G, 15th Floor 15 COUNTY SHERIFF'S DEPUTIES A. Judge: Hon. Joseph C. Spero, Presiding CONIGLIO, THOMAS HENDERSON, Date Action Filed: November 16, 2015 16 JEFF JACKSON, J. KIRKHAM, DAVID Trial Date: None Assigned LONDONO, TYLER NELSON, KATIE 17 RHOE, A. ROSSI and TRAVIS 18 WRANGHAM, LAFAYETTE POLICE SERGEANT D. NUGENT, LAFAYETTE 19 POLICE OFFICERS BRAD IMHOFF and B. PARKER, SAN RAMON POLICE 20 OFFICER FNU BRUCE, B.D., a minor, 21 N.M., a minor, and B.S., a minor, and DOES 1-100. 22 Defendants. 23 24 Pursuant to Civil Local Rule 6-1(a), Plaintiffs MARCUS HURT, CARLY MAGNUS, 25 and CREIGHTON HURT, by and through their attorney of record, Andrew C. Schwartz of the 26 Casper, Meadows, Schwartz & Cook law firm, and Defendants CONTRA COSTA COUNTY 27 SERGEANT DAVID ADAMS, CONTRA COSTA COUNTY SHERIFF'S DEPUTIES JEFF 28 JACKSON, J. KIRKHAM, DAVID LONDONO, TYLER NELSON, KATIE RHOE, A. STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT - Case No. C15-05223 JCS

Hurt et al v. Adams et al

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ROSSI, and TRAVIS WRANGHAM, LAFAYETTE POLICE SERGEANT D. NUGENT, and LAFAYETTE POLICE OFFICERS BRAD IMHOFF and B. PARKER, by and through their attorney of record, Deputy County Counsel Nima E. Sohi of the Contra Costa County Counsel's Office, hereby stipulate to an extension of time for the above-named defendants to file a responsive pleading to Plaintiff's Complaint, filed on November 16, 2015.

## **RECITALS**

- 1. On November 16, 2015, Plaintiff filed a complaint alleging violations of his civil rights pursuant to 42 U.S.C. §§ 1983 and 1988. *See* ECF Doc. No. 1.
- 2. The response to the complaint by Defendants CONTRA COSTA COUNTY SERGEANT DAVID ADAMS, CONTRA COSTA COUNTY SHERIFF'S DEPUTIES JEFF JACKSON, J. KIRKHAM, DAVID LONDONO, TYLER NELSON, KATIE RHOE, A. ROSSI, and TRAVIS WRANGHAM, LAFAYETTE POLICE SERGEANT D. NUGENT, and LAFAYETTE POLICE OFFICERS BRAD IMHOFF and B. PARKER, is currently due on January 26, 2016.
- 3. The Contra Costa County Counsel's Office represents all of the above referenced defendants, and CONTRA COSTA COUNTY SHERIFF'S DEPUTIES A.
  CONIGLIO and THOMAS HENDERSON. Service of the summons and complaint has not been completed at this time as to Defendants A. CONIGLIO and THOMAS HENDERSON.
- 4. Therefore, the parties to this stipulation have stipulated and agreed that a response to the complaint by Defendants CONTRA COSTA COUNTY SERGEANT DAVID ADAMS, CONTRA COSTA COUNTY SHERIFF'S DEPUTIES JEFF JACKSON, J. KIRKHAM, DAVID LONDONO, TYLER NELSON, KATIE RHOE, A. ROSSI, and TRAVIS WRANGHAM, LAFAYETTE POLICE SERGEANT D. NUGENT, and LAFAYETTE POLICE OFFICERS BRAD IMHOFF and B. PARKER, shall be due no later than February 26, 2016. Pursuant to Civil Local Rule 6-1(a), the parties attest that the requested extension of time to answer or otherwise respond to the complaint will not alter the date of any event or

any deadline already fixed by Court order. 1 **STIPULATION** 2 3 Pursuant to Civil Local Rule 6-1(a), the parties hereby stipulate that the response of Defendants CONTRA COSTA COUNTY SERGEANT DAVID ADAMS, CONTRA COSTA 4 COUNTY SHERIFF'S DEPUTIES JEFF JACKSON, J. KIRKHAM, DAVID LONDONO, 5 TYLER NELSON, KATIE RHOE, A. ROSSI, and TRAVIS WRANGHAM, LAFAYETTE 6 7 POLICE SERGEANT D. NUGENT, and LAFAYETTE POLICE OFFICERS BRAD IMHOFF and B. PARKER, to the complaint filed on November 16, 2015, will be due no later 8 9 than February 26, 2016. 10 11 DATED: January 22, 2016 CASPER, MEADOWS, SCHWARTZ & COOK 12 By: /s/ - "Andrew C. Schwartz" 13 ANDREW C. SCHWARTZ 14 Attorneys for Plaintiffs 15 DATED: January 22, 2016 SHARON L. ANDERSON 16 **COUNTY COUNSEL** 17 18 19 /s/ - "Nima E. Sohi" By: NIMA E. SOHI 20 **Deputy County Counsel** Attorneys for Defendants 21 SERGEANT DAVID ADAMS, JONATHAN KIRKHAM, DAVID LONDONO, 22 TYLER NELSON, KATIE RHOE, ANTHONY 23 ROSSI, TRAVIS WRANGHAM, SERGEANT DANIÉL NUGENT, OFFICERS JEFF ACKSON, BRAD IMHOFF, and BERCH 24 IT IS SO ORDERED **PA**RKER 25 Dated 1/25/16 26 Judge Joseph C. Spero 27 28