1 JAMES V. FITZGERALD, III (State Bar No. 55632) james.fitzgerald@mcnamaralaw.com 2 NOAH G. BLECHMAN (State Bar No. 197167) noah.blechman@mcnamaralaw.com 3 ELIZABETH M. DOOLEY (State Bar No. 289510) elizabeth.dooley@mcnamaralaw.com 4 MCNAMARA, NEY, BEATTY, SLATTERY, **BORGES & AMBACHER LLP** 5 1211 Newell Avenue Walnut Creek, CA 94596 6 Telephone: (925) 939-5330 Facsimile: (925) 939-0203 7 Attorneys for Defendant 8 City of Concord 9 UNITED STATES DISTRICT COURT 10 NORTHERN DISTRICT OF CALIFORNIA 11 12 ROSAMANDA FLORES, Case No. C15-05244 TEH 13 Plaintiff, STIPULATION AND [PROPOSED] ORDER CONTINUING CASE 14 MANAGEMENT CONFERENCE vs. THE CITY OF CONCORD AND 15 **DEFENDANT OFFICERS DOES 1** 16 THROUGH 50, 17 Defendants. 18 19 IT IS HEREBY STIPULATED AND AGREED, by and between the parties to this action, 20 through their respective counsel of record, as follows: 21 WHEREAS the parties are respectfully requesting that the Court continues the Initial Case 22 Management Conference set for May 2, 2016, to May 9, 2016. 23 WHEREAS undersigned counsel for the Defendant, who is newly appearing in this case is 24 unavailable and in Southern California on May 2<sup>nd</sup>. In addition, undersigned counsel for the 25 Defendant has another Case Management Conference with Your Honor on May 9<sup>th</sup> as well. 26 WHEREAS good cause exists to continue the Further Case Management Conference to 27 May 9th. 28 STIPULATION AND ORDER CONTINUING CASE

MANAGEMENT CONFERENCE - C15-05244 TEH

1	The parties attest that concurrence in the filing of these documents has been obtained from
2	each of the other Signatories, which shall serve in lieu of their signatures on the document.
3	
4	IT IS SO STIPULATED
5	
6	Dated: April 8, 2016 MCNAMARA, NEY, BEATTY, SLATTERY,
7	BORGES & AMBACHER LLP
8	
9	By: <u>/S/ Blechman, Noah</u> James V. Fitzgerald, III Noah G. Blechman
10	Elizabeth M. Dooley
11	Attorneys for Defendant City of Concord
12	Dated: April 8, 2016
13	*
14	By: <u>/s/ Goff, Stanley</u> Stanley Goff
15	Attorney for Plaintiff
16	
17	<u>ORDER</u>
18	PURSUANT TO THE PARTIES' STIPULATION, IT IS HEREBY ORDERED AS
19	FOLLOWS:
20	The Further Case Management Conference set for May 2, 2016, is hereby continued to
21	May 9, 2016, at 1:30 p.m. The parties are to file the Initial Case Management Conference
22	statement no later than one week prior to this conference.
23	
24	IT IS SO ORDERED
25	
26	Dated:, 2016
27	By: Hon. Thelton E. Henderson
28	U.S. Senior District Court Judge
	STIPULATION AND ORDER CONTINUING CASE 2

MANAGEMENT CONFERENCE – C15-05244 TEH