1 BRUCE D. GOLDSTEIN #135970 County Counsel JOSHUA A. MYERS #250988 Deputy County Counsel 3 County of Sonoma 575 Administration Drive, Room 105A 4 Santa Rosa, California 95403 Telephone: (707) 565-2421 Facsimile: (707) 565-2624 5 E-mail: joshua.myers@sonoma-county.org 6 7 Attorneys for Defendants Ken Johnson and Spencer Crum 8 9 UNITED STATES DISTRICT COURT 10 NORTHERN DISTRICT OF CALIFORNIA 11 12 RONALD MAZZAFERRO. Case No. CV-16-5641-WA 13 Plaintiff, STIPULATION AND PROPOSED ORDER EXTENDING DEADLINE FOR 14 VS. SONOMA COUNTY DEFENDANTS TO RESPOND TO PLAINTIFF'S FOURTH 15 WILLIAM PARISI, et al., AMENDED COMPLAINT 16 Defendants. 17 18 Defendants Ken Johnson, Spencer Crum, Bruce D. Goldstein, and Joshua A. 19 Myers (hereinafter "Sonoma County Defendants"), and Plaintiff Ronald Mazzaferro 20 (collectively, the "parties") hereby stipulate that the Sonoma County Defendants may file 21 their response to Plaintiff's fourth amended complaint on or before August 10, 2017. 22 Pursuant to Local Rule 6-1(a), the parties believe that no court order is necessary 23 for this stipulation because it only involves extending the time for the Sonoma County 24 Defendants to respond to Plaintiff's fourth amended complaint and such an extension of 25 time will not affect any events or deadlines already fixed by the court. 26 In an abundance of caution, however, the parties have included a proposed order 27 regarding this stipulation in the event the Court determines that this request is more 28 properly governed by Local Rule 6-1(b). CV-16-5641-WA Stip & Proposed Order re Ext of Time 1

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BACKGROUND FOR STIPULATION

On or about July 7, 2017, the Court entered an Order entitled "Order Denying Motion to Dismiss, Granting Motion for a More Definite Statement, and Vacating Hearing." (Dkt. #92.) In that Order, the Court ordered Plaintiff to file a fourth amended complaint by July 20, 2017, at noon. (*Id.*, at pg. 4, lines 12-13.) If Plaintiff files a fourth amended complaint by noon on July 20, 2017, and if the fourth amended complaint alleges causes of action against any of the Sonoma County Defendants, then their response would be due on or about August 3, 2017, or 14 days after Plaintiff files his fourth amended complaint. (FRCP, Rule 15(a)(3).)

Undersigned counsel for Defendants Ken Johnson and Spencer Crum has a preplanned vacation from July 20, 2017 through July 31, 2017. Counsel will not return to his office until August 1, 2017. Counsel will likely not have sufficient time to prepare a response to Plaintiff's fourth amended complaint by August 3, 2017, assuming Plaintiff continues to make claims against the Sonoma County Defendants.

STIPULATION

Therefore, pursuant to Local Rule 6-1(a), the parties stipulate and agree that if Plaintiff files a fourth amended complaint by noon on July 20, 2017, and if that fourth amended complaint raises claims against any or all of the Sonoma County Defendants, then the Sonoma County Defendants will have up to and including August 10, 2017, to file and serve a response to Plaintiff's fourth amended complaint. Pursuant to Local Rule 5-1(i)(3), Plaintiff has given counsel for Defendants Ken Johnson and Spencer Crum permission to file this document which indicates his concurrence in the filing. Counsel for Defendants Ken Johnson and Spencer Crum and Plaintiff believe this extension of time will not affect any court events or deadlines.

Pursuant to Local Rule 6-1(b), the parties request the Court enter the following proposed order approving this stipulation if the Court believes a court order approving this stipulation is necessary.

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1	Dated: July 18, 2017	BRUCE D. GOLDSTEIN, County Counsel
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3		By: <u>/s/ Joshua A. Myers</u> Joshua A. Myers
4		Deputy County Counsel
5		Attorneys for Defendants Ken Johnson & Spencer Crum
6		Ken Johnson & Spencer Crum
7	Dated: July 18, 2017	
8		<u>/s/</u> Ronald Mazzaferro, in pro per
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14	PURSUANT TO STIPULAT	ION, IT IS SO ORDERED
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16	Dated:, 2017.	In Am
17		Hon. William Alsup
18		United States District Judge
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