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10 Attorneys for Plaintiff J.H., a Minor,  
 11 through his Guardian ad Litem, Joan Tillman

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

15 J.H., a minor, through his Guardian ad  
 16 Litem, JOAN TILLMAN,

17 Plaintiff,

18 v.

19 COUNTY OF SAN MATEO; AYSE  
 20 DOGAN; JULIE BERKOVATZ;  
 21 TAMIKA DAWSON; and DOES 1 to 50,  
 inclusive,

22 Defendants.  
 23

CASE NO. 20-CV-00961-VC

**STIPULATION TO CONTINUE CASE  
 MANAGEMENT CONFERENCE AND  
 EXTEND THE DEADLINE FOR  
 DEFENDANTS TO FILE THEIR  
 RESPONSE TO PLAINTIFF'S SECOND  
 AMENDED COMPLAINT**

Action Filed: February 7, 2020

Trial Date: TBD

24 Plaintiff J.H. ("Plaintiff") and Defendants COUNTY OF SAN MATEO, AYSE DOGAN,  
 25 and JULIE BERKOVATZ ("Defendants") hereby stipulate, by and through their counsel, to  
 26 extend the deadline by two weeks for Defendants to file their responsive pleading to Plaintiff's  
 27 Second Amended Complaint which, following the court's ruling on Defendants' motion to  
 28

1 dismiss Plaintiff's First Amended Complaint (ECF-33), is required to be filed by December 7,  
2 2020. As such, Defendants' responsive pleading to Plaintiff's Second Amended Complaint is  
3 due no later than January 11, 2021.

4 Plaintiff and Defendants further hereby stipulate to continue the initial Case Management  
5 Conference currently set for October 20, 2020 at 10:00 a.m. to a date following Defendants'  
6 filing of their responsive pleading or after January 11, 2021 given that the case is not at issue and  
7 it is unclear at this time how or to what extent Plaintiff may amend its complaint. Plaintiff and  
8 Defendants have made repeated attempts to contact defendant Dawson's counsel via email and  
9 telephone but as of this date, Dawson's counsel has not responded. Additionally, the court's  
10 reference during the October 8, 2020 hearing to the possibility of staying the civil case while the  
11 underlying criminal case against defendant Dawson is pending further supports a continuance of  
12 the initial Case Management Conference.

13  
14 **IT IS SO STIPULATED.**

15 Dated: October 13, 2020

ALTAIR LAW  
and  
LAW OFFICE OF JOSEPH S. MAY

16  
17  
18 /s/ Joseph S. May

By: JOSEPH S. MAY  
Attorneys for Plaintiff J.H.

19  
20 Dated: October 13, 2020

JOHN C. BEIERS, COUNTY COUNSEL

21 /s/ Joseph F. Charles

By: JOSEPH F. CHARLES and  
KIMBERLY A. MARLOW  
Attorneys for Defendants County of San  
Mateo, Dogan, and Berkovatz

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~~[PROPOSED]~~ ORDER

Pursuant to the foregoing stipulation, and for good cause shown, the Court hereby continues the deadline for the filing of Defendants' responsive pleading to Plaintiff's Second Amended Complaint to no later than January 11, 2021.

The Court also continues the Initial Case Management Conference from October 20, 2020 to March 3, 2021.

**IT IS SO ORDERED.**

DATED: October 14, 2020



HON. VINCE CHHABRIA  
United States District Judge