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7 Attorneys for Defendants

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

10 MARK ANTHONY JAEGLER SR, MARK)	Case No.: 09-0242 CW
11 ANTHONY JAEGLER JR., Individually and)	Related Case No.: 09-03181 CW
12 on Behalf of All Others Similarly Situated,)	
13 Plaintiffs,)	STIPULATION TO CONTINUE CASE
14 vs.)	MANAGEMENT CONFERENCE AND
15 THE COUNTY OF ALAMEDA, et al.,)	PROPOSED ORDER
16 Defendants.)	Complaint Filed: January 20, 2009
	CMC Hearing Date: September 14, 2010
	Time: 2:00 p.m.

17 The undersigned hereby stipulate and jointly respectfully request the Court to order
18 as follows:

19 That due to matters related to other actions, the parties have not been able to
20 timely complete a joint case management conference statement for the joint case
21 management conference set for September 14, 2010 at 2:00 p.m.

22 Further, initial discovery on both cases have been conducted which have resulted
23 in numerous documents being produced. Discovery conducted on each action thus far
24 are as follows:

25 Case number 09-0242 CW: Interrogatories, Requests for Admissions and
26 Requests for Production of Documents have been propounded by Plaintiffs to all
27

1 Defendants. Numerous documents have been have been provided by Defendants in
2 response to discovery and plaintiffs are awaiting supplemental responses and
3 documents. Plaintiffs believe the forgoing written discovery primarily in the area of
4 document productions, is a necessary prerequisite to the taking of meaningful
5 depositions. To date, depositions have been taken of Plaintiffs and four (4) Defendant
6 employees and it is expected that additional testimony may be needed once Defendants
7 have complied with Plaintiffs' documents requests. Plaintiffs then can accurately report
8 which additional witness depositions they intend to take. Additional written documents
9 requests are to be propounded by Plaintiffs within the next week.

11 Case No.: 09-03181 CW: Interrogatories and Requests for Admissions have been
12 propounded by Plaintiffs to all Defendants. Plaintiffs are awaiting Defendants responses.

14 All parties concede the Case Management Conference be continued so that
15 parties can conduct the above discovery and have a better sense of what other discovery
16 may be required, if any, in addition to having a better perspective on time and offering the
17 Court future hearing dates and deadlines that are determined during the Case
18 Management Conference.

19 Wherefore the parties jointly request that the Court order as follows:

20 That the case management conference in both of the above actions set for
21 September 14, 2010 at 2:00 p.m. may be continued to October 12, 2010 at 2:00 p.m., or
22 such other date and time as the court may order.

1 That the parties file a joint case management conference statement no later than
2 October 5, 2010.

3 DATED: September 10, 2010

4 BOORNAZIAN, JENSEN & GARTHE
5 A Professional Corporation

6 By: /s/ Gregory J. Rockwell
7 GREGORY J. ROCKWELL, ESQ.
8 Attorneys for Defendants

9 DATED: September 10, 2010

10 JOHN R. COGORNO, Attorney At Law

11 By: /s/ John R. Cogorno
12 JOHN R. COGORNO, ESQ.
13 Attorneys for Plaintiffs

14 DATED: September 10, 2010

15 MICHEL F. MILLS, Attorney At Law

16 By: /s/ Michel F. Mills
17 MICHEL F. MILLS, ESQ.
18 Attorneys for Plaintiffs

19 **ORDER**

20 Good Cause appearing therefore, the Case Management Conference set for
21 September 14, 2010 at 2:00 p.m. in actions 09-0242CW and 09-03181CW is hereby
22 continued to October 12, 2010 at 2:00 p.m. The parties shall file a joint case
23 management conference statement no later than October 5, 2010.

24 Dated: 9/13/2010

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26 _____
27 CLAUDIA WILKEN
28 United States District Judge