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 THE COUNTY OF SONOMA

29 **UNITED STATES DISTRICT COURT**
 30 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 31 **OAKLAND DIVISION**

32 SONOMA COUNTY ASSOCIATION OF
 33 RETIRED EMPLOYEES,

34 Plaintiff,

35 v.

36 SONOMA COUNTY,

37 Defendant.

No. CV 09-4432 CW

**STIPULATION AND ~~PROPOSED~~
 ORDER TO CONTINUE CASE
 MANAGEMENT CONFERENCE**

Action Filed: September 22, 2009

1 Plaintiff Sonoma County Association of Retired Employees (“Plaintiff”) and Defendant
2 Sonoma County (“County”), by and through their respective counsel of record, hereby stipulate to
3 the following facts and request that the Court issue an Order continuing the Case Management
4 Conference in the above-captioned action, as set forth below.

5 WHEREAS, Plaintiff filed its Complaint (the “Complaint”) with this Court on September
6 22, 2009.

7 WHEREAS, the County filed a Motion to Dismiss the Complaint on December 18, 2009.

8 WHEREAS, on May 14, 2010, this Court granted the County’s Motion to Dismiss with
9 leave to amend.

10 WHEREAS, Plaintiff filed its First Amended Complaint (the “Amended Complaint”) with
11 this Court on July 6, 2010.

12 WHEREAS, the County filed a Motion to Dismiss the Amended Complaint (the “Motion
13 to Dismiss”) on July 27, 2010 .

14 WHEREAS, the County’s Motion to Dismiss is currently under submission and a hearing
15 has not been scheduled.

16 WHEREAS, a Case Management Conference is currently scheduled for September 14,
17 2010.

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Based upon the foregoing facts, IT IS HEREBY STIPULATED AND AGREED:

1. That, given the pending Motion to Dismiss, the Case Management Conference be continued thirty (30) days after the currently scheduled Conference, or as soon thereafter as this Court may hear this matter.

IT IS SO STIPULATED.

DATED: September 3, 2010

LEWIS, FEINBERG, LEE, RENAKER &
JACKSON, P.C.

By: /s/ Bill Lann Lee
JEFFREY LEWIS
BILL LANN LEE
Attorneys for Plaintiff
SONOMA COUNTY ASSOCIATION OF
RETIRED EMPLOYEES

DATED: September 3, 2010

HANSON BRIDGETT LLP

By: /s/ Raymond F. Lynch
RAYMOND F. LYNCH
SARAH D. MOTT
Attorneys for Defendant
SONOMA COUNTY

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ORDER

The Court, having reviewed the above Stipulation to Continue the Case Management Conference, HEREBY ORDERS AS FOLLOWS:

The Case Management Conference, previously scheduled for September 14, 2010 at 2:00 p.m., shall be continued to Oct. 26, 2010. The parties shall file a CMC statement a week before that date.

IT IS SO ORDERED.

Dated: September 9, 2010



HON. CLAUDIA WILKEN
United States Judge

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SIGNATURES UNDER GENERAL ORDER NO. 45

Pursuant to General Order No. 45 of the United States District Court, Northern District of California, I, Raymond F. Lynch—the ECF User whose User ID and Password are used in the filing of this document—hereby attest that the concurrence to the filing of this document has been obtained from each of the other signatories to this document.

/s/ Raymond F. Lynch
Raymond F. Lynch