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5 Attorney for Plaintiffs  
 DAREN HEATHERLY;  
 6 IRMA RAMIREZ; and BENSON KINNEY JR.

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 8 **UNITED STATES DISTRICT COURT**  
 9 **NORTHERN DISTRICT OF CALIFORNIA**

10	DAREN HEATHERLY; IRMA RAMIREZ; )	<b>CASE NO. CV-13-4327-KAW</b>
11	and HARRISON BENSON KINNEY JR., )	
12	Plaintiffs, )	<b>STIPULATION RE CONTINUING</b>
13	v. )	<b>DEADLINE FOR THE PARTIES TO</b>
14	SONOMA COUNTY FAIR and )	<b>CONDUCT THE JOINT SITE</b>
15	EXPOSITION, INC.; and COUNTY of )	<b>INSPECTION; and <del>PROPOSED</del> ORDER</b>
16	SONOMA, )	<b>THEREON</b>
	Defendants. )	

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 20 Plaintiffs DAREN HEATHERLY; IRMA RAMIREZ and BENSON KINNEY JR., and  
 21 Defendants SONOMA COUNTY FAIR and EXPOSITION, INC.; and COUNTY of SONOMA,  
 22 by and through their respective attorney of record, respectfully request and stipulate, as follows:

23 1. **Whereas**, all defendants have been served with the summons and complaint and  
 24 have answered plaintiffs' complaint; and

25 2. **Whereas**, pursuant to General Order 56, ¶3,4, the parties were to have the Joint  
 26 Site Inspection at the Sonoma County Fairgrounds, located at/near 1350 Bennett Valley Road,  
 27 Santa Rosa, California completed by no later than January 1, 2014.

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**STIPULATION RE CONTINUING DEADLINE FOR THE PARTIES TO CONDUCT THE JOINT SITE INSPECTION; and  
 [PROPOSED] ORDER THEREON**

**CASE NO. CV-13-4327-KAW**

1 The parties had agreed to conduct the inspection on February 12, 2014; however, plaintiffs'  
2 expert was ill. Therefore, the parties were unable to have the General Order 56 Joint Site  
3 Inspection as scheduled; and

4 3. **In light of the above**, the parties have agreed to reschedule and conduct the joint  
5 site inspection on April 1, 2014.

6 **IT IS SO STIPULATED:**

7 That, plaintiffs DAREN HEATHERLY; IRMA RAMIREZ; and BENSON KINNEY  
8 JR., and defendants SONOMA COUNTY FAIR and EXPOSITION, INC.; and COUNTY of  
9 SONOMA agree, stipulate and respectfully request that the last day for the parties and counsel to  
10 conduct the General Order 56 Joint Site Inspection of the premises be continued up to and  
11 including April 11, 2014.

12 This stipulation may be executed in counterparts and have the same force and effect as  
13 though all signatures are on the same and/or consecutive pages. Photocopies and facsimile shall  
14 have the same force and effect as originals.

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16 Respectfully submitted,

17  
18 Dated: February 25, 2014

THOMAS E. FRANKOVICH, Esq.

19 ***A PROFESSIONAL LAW CORPORATION***

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21 By: \_\_\_ /s/Thomas E. Frankovich \_\_\_\_\_

22 Thomas E. Frankovich  
23 Attorney for Plaintiffs DAREN HEATHERLY;  
IRMA RAMIREZ; and BENSON KINNEY JR.

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28 **STIPULATION RE CONTINUING DEADLINE FOR THE PARTIES TO CONDUCT THE JOINT SITE INSPECTION; and  
[PROPOSED] ORDER THEREON**

CASE NO. CV-13-4327-KAW

1 Dated: February 27, 2014

BERTRAND, FOX & ELLIOT,

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By: \_\_\_\_\_/s/Eugene B. Elliot\_\_\_\_\_  
Eugene B. Elliot, Esq.

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Attorneys for Defendants SONOMA COUNTY  
FAIR and EXPOSITION, INC.; and COUNTY of  
SONOMA

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**PROPOSED ORDER**

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**IT IS SO ORDERED**, that the last day for the parties and counsel to conduct the joint site

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inspection of the premises be continued up to and including 4/11, 2014.

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Dated: 3/5, 2014



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Honorable Kandis A. Westmore

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United States Magistrate Judge of California

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