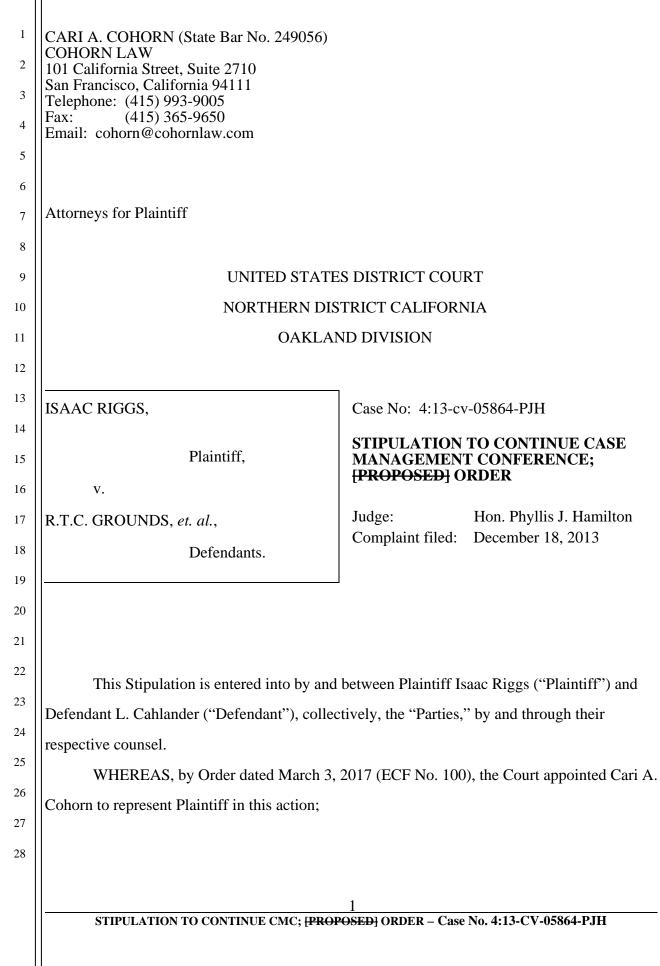
COHORN LAW 101 California Street, Suite 2710 San Francisco, CA 94111

Telephone: (415) 993-9005



WHEREAS, by Order dated March 7, 2017 (ECF. No. 101), the Court set a Case Management Conference for April 20, 2017 and directed the parties to file a joint Case Management Statement (the "Statement") on or before April 13, 2014;

WHEREAS, promptly after her appointment, Plaintiff's counsel initiated the process of obtaining clearance to meet with Plaintiff, an inmate at Kern Valley State Prison;

WHEREAS, the clearance process has been completed, but due to pre-existing schedule conflicts, the earliest date on which Plaintiff's counsel can meet with Plaintiff is April 14, 2017, one day after the Parties' joint Statement is currently due;

WHEREAS, counsel for both Parties' agree that, in order to have a productive and meaningful discussion before filing the Statement, Plaintiff should meet with his counsel before counsel meet and confer;

WHEREAS, the Parties agree that a brief continuance of the Case Management Conference and a commensurate extension of time for filing the Statement will permit more efficient and effective case management, thereby conserving resources of the Parties, counsel, and the Court;

16 WHEREAS, there have been no previous time modifications with respect to the Case 17 Management Conference. Previous time modifications in this case include: (1) a 60-day 18 extension of time for Defendant to file a dispositive motion (see ECF No. 27, filed 6/25/14, and 19 ECF No. 29, filed 7/8/14); (2) a 31-day extension of time for each Party to file briefs concerning 20 the effect of Plaintiff's loss of good time credits on his sentence (see ECF No. 40, filed 12/5/14, 21 and ECF No. 41, filed 12/9/14); and (3) a 45-day extension of time for Defendant to file an 22 opposition to Plaintiff's motion to compel discovery responses (see ECF No. 60, filed 6/2/15, 23 and ECF No. 61, filed 7/10/15); and

WHEREAS, because there are no other dates or deadlines currently on calendar in this
action, the requested modification will not impact the schedule for further handling of this case.
NOW, THEREFORE, pursuant to Civil Local Rules 6-2 and 7-12, the Parties hereby
stipulate and agree as follows:

COHORN LAW 101 California Street, Suite 2710 San Francisco, CA 94111 Telephone: (415) 993-9005 1

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1	1. The April 20, 2017 Case Management Conference shall be taken off calendar and
2	rescheduled for May 4, 2017, or the earliest date thereafter convenient to the Court.
3	2. The deadline to file the Statement shall be continued to 7 calendar days before
4	the date set for the Case Management Conference.
5	IT IS SO STIPULATED.
6	Dated: April 10, 2017 COHORN LAW
7	By/s/ Cari A. Cohorn
8 9	Cari A. Cohorn Attorneys for Plaintiff Isaac Riggs
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11	Dated: April 10, 2017 XAVIER BECERRA ATTORNEY GENERAL OF CALIFORNIA
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13	By/s/ Kyle A. Lewis
14	Kyle A. Lewis Deputy Attorney General
15	Attorneys for Defendant L. Cahlander
16	
17	PURSUANT TO STIPULATION OF THE PARTIES, IT IS SO ORDERED. Case management conference continued to May 18, 2017 at 02:00 p.m.
18	Dated: April <u>10</u> , 2017
19	IT IS SO ORDERED
20	The Honor: Judge Phyllis J. Hamilton
21	
22	Attestation Per Local Rule 5-1(i)(3):
23	I, Cari A. Cohorn, attest that that concurrence in the filing of this document has been
24	obtained from each of the other Signatories.
25	Dated: April 7, 2017
26	
27	By <u>/s/ Cari A. Cohorn</u>
28	Cari A. Cohorn
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	3 STIPULATION TO CONTINUE CMC; [PROPOSED] ORDER – Case No. 4:13-CV-05864-PJH

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