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 10 NORTHERN DISTRICT CALIFORNIA
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13 ISAAC RIGGS,

15 Plaintiff,

16 v.

17 R.T.C. GROUNDS, *et. al.*,

18 Defendants.

Case No: 4:13-cv-05864-PJH

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

Judge: Hon. Phyllis J. Hamilton

Complaint filed: December 18, 2013

22 This Stipulation is entered into by and between Plaintiff Isaac Riggs (“Plaintiff”) and
 23 Defendant L. Cahlander (“Defendant”), collectively, the “Parties,” by and through their
 24 respective counsel.

25 WHEREAS, by Order dated March 3, 2017 (ECF No. 100), the Court appointed Cari A.
 26 Cohorn to represent Plaintiff in this action;

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

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

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

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

12 WHEREAS, the Parties agree that a brief continuance of the Case Management
13 Conference and a commensurate extension of time for filing the Statement will permit more
14 efficient and effective case management, thereby conserving resources of the Parties, counsel,
15 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

24 WHEREAS, because there are no other dates or deadlines currently on calendar in this
25 action, the requested modification will not impact the schedule for further handling of this case.

26 NOW, THEREFORE, pursuant to Civil Local Rules 6-2 and 7-12, the Parties hereby
27 stipulate and agree as follows:
28

