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11 Attorneys for Defendants COUNTY OF ALAMEDA, sued herein as "ALAMEDA COUNTY
 12 AND ALAMEDA COUNTY SHERIFF'S OFFICE," GREGORY J. AHERN, BRETT M.
 13 KETELES, TOM MADIGAN, and D. SKOLDQVIST

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA

16 CYNTHIA N. TURANO, individually and on behalf of) others similarly situated,) 17) 18 Plaintiffs,) 19 v.) 20) 21 ALAMEDA COUNTY, et al.,) 22) 23 Defendants.) 24) 25) 26) 27) 28)	Case No. 4:17-cv-06953-KAW STIPULATION TO EXTEND TIME TO RESPOND TO FIRST AMENDED COMPLAINT AND TO CONTINUE INITIAL CASE MANAGEMENT AND RELATED DATES; [PROPOSED] ORDER First Amended Complaint filed January 21, 2018
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Pursuant to Civil Local Rule 7-12, all parties stipulate by and through their respective counsel, stipulate to extend the time for Defendant Alameda County to respond to Plaintiff's First Amended Complaint and to continue the initial case management conference scheduled for March 6, 2018 and related dates, including ADR deadlines, currently scheduled for February 13, 2018, and the last date to file a Rule 26(f) report, currently scheduled for February 27, 2018.

1. Plaintiff filed her Complaint on December 5, 2017 and her First Amended Complaint against Alameda County, Sheriff Gregory J. Ahern and other individual members of the Alameda County Sheriff's Office ("Alameda County Defendants"), the City of Oakland and individual Oakland Police Department officers ("City of Oakland Defendants").

2. As to the Alameda County Defendants, Plaintiff alleges various constitutional violations arising from her confinement at Santa Rita Jail in Dublin, California.

1 3. Alameda County was served on February 5, 2018, making February 26, 2018 the
2 deadline for Alameda County to answer or otherwise respond to the First Amended Complaint. To
3 date, no individual member of the Alameda County Sheriff's Office has been served, although
4 defense counsel is working assiduously to obtain individual waivers of service from each
5 individual member of the Alameda County Sheriff's Office.

6 4. Defense counsel just received this assignment on February 13, 2018 and
7 immediately began evaluating the First Amended Complaint to prepare a response on behalf of the
8 County of Alameda and to obtain waivers of service for the individually named Alameda County
9 defendants.

10 5. The County of Alameda needs additional time to answer or otherwise respond to
11 the First Amended Complaint. The individually named Alameda County defendants have not yet
12 been served, but defense counsel anticipates that waivers of service of process will be obtained.

13 6. The parties have met and conferred and agree to extend the time for the County of
14 Alameda to answer or otherwise respond to Plaintiff's First Amended Complaint by 60 days, from
15 the current deadline of February 26, 2018 to April 27, 2018.

16 7. By order dated December 6, 2018, the Court set an initial case management
17 conference on March 6, 2018. Dkt. No. 4. The parties further stipulate to continue the initial case
18 management conference currently scheduled for March 6, 2018 to May 4, 2018 and all related
19 dates by sixty days.

20 8. No prior extensions of time have been requested by the County of Alameda.

21 THEREFORE, IT IS HEREBY STIPLUATED by and between Plaintiff and Defendants
22 that Defendants will have until April 27, 2018 to respond to Plaintiff's First Amended Complaint.
23 The Parties further stipulate and respectfully request that the Court continue the initial case
24 management conference currently scheduled for March 6, 2018 to May 4, 2018 and all related
25 dates by sixty days.

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IT IS SO STIPULATED.

DATED: February 23, 2018

BOORNAZIAN, JENSEN & GARTHE
A Professional Corporation

By: /s/ Gregory B. Thomas
GREGORY B. THOMAS, ESQ.
TEMITAYO O. PETERS, ESQ.
Attorneys for COUNTY OF ALAMEDA,
GREGORY J. AHERN, BRETT M. KETELES,
TOM MADIGAN, and D. SKOLDQVIST

DATED: February 23, 2018

BARBARA J. PARKER, City Attorney
OTIS McGEE, Jr., Chief Assistant City Attorney
COLIN BOWEN, Supervising Trial Attorney
ANA GARDEA, Deputy City Attorney

By: /s/ Ana Gardea
Attorneys for Defendants
CITY OF OAKLAND, JONATHAN
ADAYA, JOSEPH DURAN, and
RYAN TIOYAO

DATED: February 23, 2018

LAW OFFICE OF YOLANDA HUANG

By: /s/ Yolanda Huang
YOLANDA HUANG, ESQ.
Attorney for Plaintiff

DECLARATION REGARDING CONCURRENCE

Under N.D. Cal. Local Rule 5-1(i)(3), I attest that I obtained concurrence in the filing of
this document from the other signatories listed here.


By: /s/ Gregory B. Thomas
GREGORY B. THOMAS, ESQ.

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The County of Alameda is to answer or otherwise respond to Plaintiff's First Amended Complaint by April 27, 2018. The initial case management conference will be held on May 4, 2018, ADR deadlines are continued to April 13, 2018, and the last date to file a Rule 26(f) report is continued to April 27, 2018. The parties shall file a joint case management conference statement seven days prior to the initial case management conference.

DATED: 2/27/18


HONORABLE KANDIS A. WESTMORE
United States Magistrate Judge