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8 Attorneys for Defendant
 9 COUNTY OF CONTRA COSTA

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

12 FELIPE HERNANDEZ, an individual,
 13
 14 Plaintiff,
 15 v.
 16 COUNTY OF CONTRA COSTA, a
 17 municipal corporation; and DOES 1-50,
 18 inclusive,
 19 Defendants.

No. C18-00267 KAW

STIPULATION AND [~~PROPOSED~~]
 ORDER EXTENDING DATE TO FILE
 RESPONSIVE PLEADINGS AND
 CONTINUING INITIAL CASE
 MANAGEMENT CONFERENCE AND
 RELATED DATES

CMC: April 17, 2018

Crtrm: 4, 3rd Floor
 Judge: Hon. Kandis A. Westmore, Presiding
 Date Action Filed: January 11, 2018
 Trial Date: None Assigned

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 23 The parties, by and through their attorneys, have met and conferred regarding Plaintiff
 24 Felipe Hernandez’s (“Plaintiff”) complaint and defendant County of Contra Costa’s
 25 (“County”) proposed motion to dismiss under Federal Rule of Civil Procedure 12(b)(6). The
 26 County’s responsive pleadings are currently due on April 6, 2018. Based on the parties’
 27 conversation, the parties agreed that additional time is needed for Plaintiff to consider filing an
 28 amended complaint for the County’s responsive pleadings and for the case management

1 conference. Based on the above, the parties have agreed to stipulate to the following time
2 schedule:

3 (1) The parties stipulate that Plaintiff will, if necessary, file an amended complaint
4 by April 17, 2018. If Plaintiff determines that an amended complaint is not necessary, he will
5 notify the County by April 17, 2018, that he will not be filing an amended complaint. If no
6 amended complaint is filed, the County's responsive pleadings will be filed by April 24, 2018,
7 seven days after Plaintiff's notice. If Plaintiff files an amended complaint, the County's
8 responsive pleadings will be filed by May 1, 2018, fourteen days after the amended complaint
9 is filed.

10 (2) The parties stipulate to a continuance of the case management conference,
11 currently scheduled for April 17, 2018, for 60 to 90 days to a date convenient to the Court's
12 calendar. The stipulation is based on the time to determine Plaintiff's potential amendments
13 to the complaint and if necessary prepare an amended complaint and the County's time to
14 review any amended complaint and prepare responsive pleadings. Currently, the case is not at
15 issue, and given the uncertainty of future claims and potential defendants, it is difficult for the
16 parties to meet and confer regarding discovery and to prepare a joint case management
17 statement.

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1 In light of the current procedural posture, the parties believe good cause exists to
2 provide time for Plaintiff to consider filing an amended complaint, to extend time for the
3 County to file responsive pleadings, and to continue the case management conference for 60
4 to 90 days to a date convenient to the Court's calendar.

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6 DATED: March 30, 2018

SHARON L. ANDERSON
COUNTY COUNSEL

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8
9 By: _____
10 DYLAN RADKE
11 Deputy County Counsel
12 Attorneys for Defendant
13 COUNTY OF CONTRA COSTA

14
15 DATED: March 30, 2018

JOHN L. BURRIS LAW OFFICES

16 By: _____
17 JAMES COOK
18 Attorney for Plaintiff
19 FELIPE HERNANDEZ

20 **ATTORNEY ATTESTATION**

21 I hereby attest that I have authorization from all of the above-named counsel to E-file
22 this statement, and this authority is reflected by the conformed signature (“/s/”) within this E-
23 filed document.

24 By: _____
25 DYLAN RADKE
26 Deputy County Counsel
27 Attorneys for Defendant
28 COUNTY OF CONTRA COSTA

ORDER

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2 There is good cause to allow Plaintiff to file an amended complaint by April 17, 2018.
3 If Plaintiff determines that an amended complaint is not necessary, he will notify the County
4 by April 17, 2018, that he will not be filing an amended complaint. If no amended
5 complaint is filed, the County's responsive pleadings will be filed by April 24, 2018, seven
6 days after Plaintiff's notice. If Plaintiff files an amended complaint, the County's responsive
7 pleadings will be filed by May 1, 2018, fourteen days after the amended complaint is filed.

8 There is further good cause to continue the initial case management conference and
9 related dates. The case management conference is continued to July 10, 2018
10 at 1:30 P.M. before the Honorable Kandis A. Westmore. The joint case management
11 statement is due July 3, 2018. All associated dates, including the date for the
12 parties to exchange initial disclosures, are likewise continued.

13 IT IS SO ORDERED.

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16 DATED: 3/30/18

By: 
HON. KANDIS A. WESTMORE
United States Magistrate Judge