

1 ALEX G. TSE (CABN 152348)
 United States Attorney
 2 SARA WINSLOW (DCBN 457643)
 Chief, Civil Division
 3 DAVID A. PEREDA (CABN 237982)
 Assistant United States Attorney
 4 1301 Clay Street
 Oakland, CA 94612
 5 Telephone: (510) 637-3701
 FAX: (510) 637-3724
 6 David.Pereda@usdoj.gov

7 Attorneys for Federal Defendants

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 OAKLAND DIVISION
 11

12 RANDY STANSBERRY,)	Case No.: C18-01563 KAW
)	
13 Plaintiff,)	STIPULATION CONTINUING CASE
)	MANAGEMENT CONFERENCE; [PROPOSED]
14 v.)	ORDER AS MODIFIED
)	
15 UNITED STATES OF AMERICA,)	
)	
16 Defendant.)	
)	
17)	
18)	

19 Pursuant to Civil L.R. 7-12, the parties, through their counsel, hereby stipulate as follows:

- 23 1. On March 12, 2018, Randy Stansberry filed this action. *See* ECF 1.
- 24 2. On April 2, 2018, Ms. Stansberry completed service of the summons and complaint.
- 25 3. The parties have been meeting and conferring in good faith on whether there is
- 26 jurisdiction over this action. In doing so, the parties aim to resolve this issue without resorting to motion
- 27 practice or to at least narrow the issues if a motion is needed.

28 STIPULATION
C18-01563 KAW

1 4. The parties agree to continue the government’s deadline to respond to the complaint from
2 June 1, 2018, to June 29, 2018. If the government files a motion to dismiss as its responsive pleading,
3 the parties will agree to a mutually-convenient briefing schedule.

4 5. The parties agree to continue the Initial Case Management Conference from June 11,
5 2018, to August 7, 2018.

6
7 IT IS SO STIPULATED.

8
9 DATED: June 4, 2018

Respectfully submitted,

10 ALEX G. TSE
11 Acting United States Attorney

12 /s/ David Pereda
13 DAVID PEREDA
14 Assistant United States Attorney

Attorneys for Defendant

15 DATED: June 4, 2018

PERKINS & ASSOCIATES

16 */s/ Natalia Asbill
17 NATALIA D. ASBILL

Attorneys for Plaintiff

18
19 PURSUANT TO STIPULATION, IT IS SO ORDERED.

20
21
22 Dated: 6/6/18

23 Kandis Westmore
24 KANDIS A. WESTMORE
25 UNITED STATES MAGISTRATE JUDGE

26
27
28 *In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury
that each signatory has concurred in the filing of this document.

STIPULATION
C18-01563 KAW