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	8	Attorneys for plaintiff, FRANCISCO IBARRA Suzanne Solomon, Bar No. 169005			
	9				
	10	solomon@lcwlegal.com LIEBERT CASSIDY WHITMORE A Professional Law Corporation 153 Townsend Street, Suite 520 San Francisco, CA 94107 Telephone: (415) 512-3000			
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	13	Facsimile: (415) 856-0306 Attorneys for Defendant CITY OF WATSONVILLE			
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	16	UNITED STATES DISTRICT COURT			
	17	FOR THE NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION – ECF PROGRAM			
	18				
	19	FRANCISCO IBARRA,			
	20	Plaintiff,	CASE # 5:12-cv-02271-EJD STIPULATION TO ALLOW ADDITIONAL TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT'S MOTION TO DISMISS, SET FOR HEARING ON FEB. 8, 2013.		
	21	V.			
	22	 CITY OF WATSONVILLE, a municipal corporation; CITY OF WATSONVILLE police DEPARTMENT; MANNY SOLANO, individually and as Chief of Police; TERENCE MEDINA, individually and as former Chief of Police; BELCHER, EHLE, MEDINA and ASSOCIATES; TWENTY UNKNOWN CITY AND OTHER EMPLOYEES, Defendants. 			
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	26				
Kate Wells and Aaron Lodge,	27 28				
Attorneys for plaintiff	-				
		STIPULATION TO CHAN	-1- IGE RESPONSE DEADLINE		

STIPULATION TO CHANGE RESPONSE DEADLINE

	1	WHEREAS, plaintiff's lead counsel, Kate Wells, has been involved in a jury trial (Norse case)		
	2	during the past week, and up to the actual trial was completely immersed (as a solo attorney) in		
	3	preparations for that trial, and was therefore not able to work on a response to this motion, and		
	4	WHEREAS, plaintiff's co-counsel, Aaron Lodge, has been involved in an extremely urgent		
	5	personal medical crisis involving his immediate family, and has been in doctor's offices, medical		
	6 facilities and hospitals most of the past ten days, and			
	7	WHEREAS, Plaintiff's attorney has contacted Defendant's attorney, Suzanne Solomon, and both		
	8	sides are in agreement to extend the deadline, and		
	9	WHEREAS, an extension does not necessitate a change in the scheduled hearing date,		
	10	IT IS HEREBY STIPULATED that Plaintiff may respond to Defendant's current motion by		
11		December 10, 2012, with replies due one week later on December 17, 2012, and the hearing		
	12	remaining unchanged, on February 8, 2013.		
	13			
	14			
	15	IT IS SO STIPULATED.		
	16 17	Dated: Nov. 7, 2012 $/S/$		
	17	AARON LODGE, Attorney for Plaintiff FRANK IBARRA		
	18 19	Dated: Nov. 8, 2012		
	20	SUZANNE SOLOMON, Attorney for Defendant City of Watsonville		
	20 21			
	21			
	22	PURSUANT TO STIPULATION, IT IS SO ORDERED, THAT: Plaintiff must respond to the current motion by December 10, 2012. Replies shall be due by December 17, 2012.		
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	25			
Kate Wells and Aaron Lodge,	26			
	27	Dated: November 14, 2012		
	28	Edward J. Davila		
Attorneys for plaintiff		United States District Judge		
		-2- STIPULATION TO CHANGE RESPONSE DEADLINE		