1 Suzanne Solomon, Bar No. 169005 ssolomon@lcwlegal.com LIEBERT CASSIDY WHITMORE 2 A Professional Law Corporation 153 Townsend Street, Suite 520 3 San Francisco, CA 94107 Telephone: (415) 512-3000 4 Facsimile: (415) 856-0306 5 Attorneys for Defendant CITY OF WATSONVILLE 6 7 UNITED STATES DISTRICT COURT 8 FOR THE NORTHERN DISTRICT OF CALIFORNIA 9 SAN JOSE DIVISION – ECF PROGRAM 10 FRANCISCO IBARRA, Case No. 5:12-cv-02271-EJD 11 Plaintiff, STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE 12 AND RELATED DATES v. 13 CITY OF WATSONVILLE; CARLOS PALACIOS, individually and as City 14 Manager; MANNY SOLANO, individually and as Asst. Chief and/or Chief of Police; 15 TERENCE MEDINA, individually and as former Chief of Police; BELCHER, EHLE, 16 MEDINA and ASSOCIATES; TWENTY 17 UNKNOWN CITY AND OTHER EMPLOYEES, 18 Defendants. 19 20 WHEREAS, the Court approved (with modification) the parties' stipulation to (1) 21 continue the Initial Case Management Conference to December 14, 2012 and (2) the Court set a 22 December 1, 2012 deadline for the parties to meet and confer regarding initial disclosures and a 23 discovery plan and (3) Case Management Conference Statements are due December 7, 2012; 24 WHEREAS, Defendants City of Watsonville, Carlos Palacios, Manny Solano, and Terry 25 Medina filed a Motion to Dismiss Plaintiff's First Amended Complaint on October 26, 2012, and 26 received a hearing date of February 8, 2013, the first date available from the Court; 27 WHEREAS, Defendant Belcher, Ehle, Medina and Associates filed a Motion to Dismiss 28 - 1 -212072.1 WA100-018 STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE AND RELATED DATES

5:12-cv-02271-EJD

1	Plaintiff's First Amended Complaint on November 9, 2012, and that motion is also set for hearing			
2	on February 8, 2013;			
3	WHEREAS, the current Case Management Conference date and resulting deadlines			
4	flowing from that schedule would have the effect of requiring the parties to meet and confer			
5	before the pleadings are settled and while all Defendants have filed Motions to Dismiss that			
6	attack all causes of action in the First Amended Complaint;			
7	IT IS HEREBY STIPULATED, pursuant to Local Rule 6-2 and the accompanying			
8	Declaration of Suzanne Solomon, between Plaintiff Francisco Ibarra and Defendants City of			
9	Watsonville, Carlos Palacios, Manny Solano, Terry Medina and Belcher, Ehle, Medina and			
10	Associates that the initial Case Management Conference be continued to March 8, 2013, and that			
11	the dates flowing from that conference be continued as follows:			
12	2/15/2013	Deadline to meet and confer re initial disclosures, ADR and		
13		discovery plan		
14	3/1/2013	Deadline to file Rule 26(f) report, complete initial		
15		disclosures and file Case Management Conference statement.		
16	IT IS SO STIPULAT	ED.		
17				
18	Dated: December , 2012	AARON LODGE		
19		By:		
20		Aaron Lodge		
21		Attorney for Plaintiff FRANCISCO IBARRA		
22	Dated: December , 2012	LIEBERT CASSIDY WHITMORE		
23	ŕ			
24		By:/S/		
25		Suzanne Solomon Attorneys for Defendant		
26		CITY OF WATSONVILLE, CARLOS PALACIOS, MANNY SOLANO, TERRY		
27		MEDINA		
28		2		
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1 .	Dated: December 3, 2012 ATCHISON BARISONE CONDOTTI & KOVACEVICH			
2	ROVACEVICII			
3	By: Leve Maran	2_		
4 5	George Kovacevich Attorneys for Defendant BELCHER, EHLE, MEDINA AND			
6	ASSOCIATES			
7				
8	PURSUANT TO STIPULATION, IT IS SO ORDERED, THAT:			
9	1. The Initial Case Management Conference is continued to March 8, 2013;			
10	2. Parties must meet and confer re initial disclosures, ADR and discovery plan by			
11	February 15, 2013; and			
12	3. Parties must file a Rule 26(f) report, complete initial disclosures and file Case			
13	Management Conference statements on or before March 1, 2013.			
14	Dated: December 4, 2012			
15	Edward J. Davila [®] United States District Judge			
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