

1 Donald E.J. Kilmer, Jr. (SBN: 179986)
E-Mail: Don@DKLawOffice.com
2 Jason A. Davis (SBN: 224250)
E-Mail: Jason@CalGunLawyers.com
3 1645 Willow Street, Suite 150
San Jose, California 95125-5120
4 Voice: (408) 264-8489
Fax: (408) 264-8487

5 Attorneys for Plaintiffs
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8 UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

9 MARK AARON HAYNIE, BRENDAN
10 JOHN RICHARDS, THE CALGUNS
11 FOUNDATION, INC., and THE
12 SECOND AMENDMENT
FOUNDATION, INC.,
Plaintiffs,

13 vs.

14 KAMALA HARRIS, Attorney General
of California (in her official capacity)
15 and CALIFORNIA DEPARTMENT
16 OF JUSTICE, CITY OF ROHNERT
PARK, OFFICER DEAN BECKER
17 (RP134), and DOES 1 TO 20,
Defendants.

Case Nos.: 3:10-CV-01255 SI
3:11-CV-02493 SI
(Consolidated Cases)

**STIPULATION and JOINT
ADMINISTRATIVE MOTION and
PROPOSED ORDER
Re: Case Management**

18
19 BRENDAN JOHN RICHARDS, THE
20 CALGUNS FOUNDATION, INC.,
21 and THE SECOND AMENDMENT
FOUNDATION, INC.,
Plaintiffs,

22 vs.

23 KAMALA HARRIS, Attorney General
of California (in her official capacity)
24 and CALIFORNIA DEPARTMENT
25 OF JUSTICE, SONOMA COUNTY
26 SHERIFFS' OFFICE, SHERIFFS'
DEPUTY GREG MYERS (SD1023)
27 and DOES 1 TO 20,
Defendants.

Case No.: 3:11-CV-05580 SI
(Related Case)

**STIPULATION and JOINT
ADMINISTRATIVE MOTION and
PROPOSED ORDER
Re: Case Management**

28

1 MAX JOSEPH PLOG-HOROWITZ,
2 THE CALGUNS FOUNDATION,
3 INC., and THE SECOND
4 AMENDMENT FOUNDATION, INC.,
Plaintiffs,

5 vs.

6 KAMALA HARRIS, Attorney General
7 of California, CALIFORNIA
8 DEPARTMENT OF JUSTICE,
9 COTATI POLICE DEPARTMENT,
10 CITY OF COTATI, ANDREW
11 LYSSAND (CO0339) and DOES 1 TO
20,
Defendants.

Case No.: 3:12-CV-0452 LB
(Related Case)

**STIPULATION and JOINT
ADMINISTRATIVE MOTION and
PROPOSED ORDER
Re: Case Management**

12 IT IS HEREBY STIPULATED¹ by and between the parties hereto through
13 their respective attorneys of record that the pending Case Management Conference
14 currently set for May 25, 2012 in Courtroom 10, 19th Floor of the U.S. District Court
15 for the Northern District of California should be reset.

16 The Defendants in *Richards v. Harris I (Rohnert Park)*, Case No.: 3:11-CV-
17 02493 SI have a motion to dismiss under submission that has been fully briefed and
18 was argued on May 4, 2012.

19 Furthermore, it would appears that a settlement has been reached between
20 the plaintiffs and the Sonoma County Defendants in *Richards v. Harris II (Sonoma
21 County)*, Case No.: 3:11-CV-05580 SI. The parties are in the process of executing
22 the necessary documents for settlement, release and dismissal of those Defendants
23 in that case.

24 _____
25 ¹ *Haynie v. Harris*, Case No.: 3:10-CV-01255 SI was ordered consolidated with
26 *Richards v. Harris*, Case No.: 3:11-CV-02493 SI, in an ordered filed on October 22,
27 2011. (See Documents # 42 and #15 respectively. The second *Richards v. Harris*,
28 Case No.: 3:11-CV-05580 was ordered to be related with the first two cases in an
order filed on December 21, 2011. (See documents #47 and # 20 respectively.) The
Ploghorowitz v. Harris, Case No.: 3:12-CV-0452 SI was ordered to be related on
April 11, 2012. (See documents #32 and #20)

1 The remaining parties propose that the Court reset the Case Management
 2 Conference to some date after the Court anticipates releasing its order from the
 3 May 4, 2012 hearing.

4 **SO STIPULATED.**

5 Date: May 16, 2012

Date: May 16, 2012

6 _____ /s/
 7 Ross Moody,
 8 Counsel for Defendants
 Harris & California Dept. of Justice

_____ /s/
 Donald Kilmer
 Counsel for Plaintiffs

9 Date: May 16, 2012

Date: May 16, 2012

10 _____ /s/
 11 Robert W. Henkels
 12 Counsel for Defendants
 13 City of Rohnert Park & Becker
 14 Counsel for Defendants
 Cotati Police Department,
 City of Cotati, & Lyssand

_____ /s/
 Anne Keck
 Counsel for Defendants
 Sonoma County & Myer

14 **ATTESTATION FOR COMPLIANCE WITH GENERAL ORDER 45 AND**
 15 **LOCAL RULE VIII.B.**

16 I, Donald Kilmer, declare under penalty of perjury under the laws of California
 17 and the United States that I have in my possession e-mail correspondence from
 18 Ross Moody, Robert Henkels and Anne Keck that the content of this document is
 19 acceptable to all persons required to sign the document. I declare that this
 20 document was signed in San Jose, CA on May 16, 2012.

21 _____ /s/
 22 Donald Kilmer
 23 Attorney for Plaintiffs

24 **ORDER**

25 The Case Management Conference in these consolidated and related matters
 26 currently set for May 25, 2012 is reset to: (Date) _____, at
 27 (Time): _____, in Courtroom 10, 19th Floor of the U.S. District Court for the
 28 Northern District of California – San Francisco. A Joint Case Management
 Conference Statement shall be filed seven (7) calendar days before the new date.

Date:

 United States District Judge

LAW OFFICE OF DONALD KILMER, APC
 1645 Willow St., Suite 150, San Jose, CA 95125
 Vc: (408) 264-8489 Fx: (408) 264-8487
 Don@DKLawOffice.com