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COUNTY OF SUTTER and SUTTER COUNTY SHERIFF'S OFFICE (erroneously sued herein as "SUTTER COUNTY SHERIFF'S DEPARTMENT") (collectively, "COUNTY DEFENDANTS")

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

ANGELA GILBERT, an individual, ANGELA GILBERT as Successor in Interest to CHAD JAMES DEAN GILBERT Pursuant to California Code of Civil Procedure section 377.30, CASEY GILBERT, SR., an individual, CASEY GILBERT, SR. as Successor in Interest to CHAD JAMES DEAN GILBERT Pursuant to California Code of Civil Procedure section 377.30,

Plaintiffs,

v.

THE COUNTY OF SUTTER, SUTTER COUNTY SHERIFF'S DEPARTMENT, SHERIFF BRANDON BARNES , DEPUTY ASHLEE MOSELEY, DEPUTY VISHAAL VIRK, DEPUTY KRISTINA HA YES, DEPUTY HOW ARD, DEPUTY CLAYTON WYMORE, DEPUTY GARZA, DEPUTY WILLIAM WARD, DEPUTY NICOLAS LOPEZ, SGT. D. INGUANZO, DEPUTY ANTHONY CALDERON, DEPUTY WILLIAM HANCOCK, DEPUTY BRANDI GUBBELS, and BI-COUNTY AMBULANCE SERVICE INC,

Defendants.

Case No. 2:25-cv-01599-SCR (PC)

STIPULATION AND [~~PROPOSED~~] ORDER TO FURTHER EXTEND DEADLINE FOR COUNTY DEFENDANTS TO FILE RESPONSIVE PLEADING

Judge: Hon. Sean C. Riordan

Trial Date: TBD

Pursuant to Local Rule 143, Plaintiffs and Defendants COUNTY OF SUTTER and SUTTER COUNTY SHERIFF'S OFFICE (erroneously sued herein as "SUTTER COUNTY SHERIFF'S DEPARTMENT") (collectively, "COUNTY DEFENDANTS"), hereby stipulate as follows:

WHEREAS, on August 18, 2025, the parties filed a stipulation indicating that the undersigned defense counsel were working to confirm representation of the individually named defendants;

WHEREAS, on August 27, 2025, pursuant to the parties' stipulation, the Court entered an order extending the COUNTY DEFENDANTS', and any other individually named defendant represented by the undersigned defense counsel, deadline to respond to the Complaint to October 3, 2025;

WHEREAS, the undersigned defense counsel have been diligently working to confirm the representation of the individually named defendants but need additional time to obtain service waivers for the individuals they do represent pursuant to Federal Rule of Civil Procedure, Rule 4;

WHEREAS, the COUNTY DEFENDANTS are the only defendants who have appeared in this matter as of the date of this stipulation and Plaintiffs' counsel are still working to perfect service, or move for default, as to the other named defendants;

WHEREAS, the parties met and conferred and agreed to further extend the COUNTY DEFENDANTS' responsive pleading deadline to permit the undersigned defense counsel to obtain service waivers from the individually named defendants they represent and prepare a single responsive pleading for their clients;

WHEREAS, defense counsel have agreed to send Plaintiffs' counsel a Waiver of Service of Summons form (AO 399) for each individual client who agrees to waive service;

NOW, THEREFORE, IT IS HEREBY STIPULATED, by and between Plaintiffs and the COUNTY DEFENDANTS, through their respective counsel, that the COUNTY DEFENDANTS shall respond to Plaintiffs' Complaint on or before November 26, 2025.

IT IS FURTHER STIPULATED that any individually named defendant, including Defendant SHERIFF BRANDON BARNES, represented by the undersigned defense counsel will

have until on or before November 26, 2025 to file a responsive pleading to the Complaint.

Dated: September 29, 2025

BURKE, WILLIAMS & SORENSEN, LLP

By: ***/s/ Temitayo O. Peters***
Gregory B. Thomas
Temitayo O. Peters
Caitlin Cozine
Attorneys for Defendants
COUNTY OF SUTTER and SUTTER COUNTY SHERIFF'S OFFICE

Dated: September 29, 2025

D.B. HILL, A PROFESSIONAL LAW CORPORATION

By: ***/s/ Dennis B. Hill*** (as authorized on September 29, 2025)
Dennis B. Hill
Attorneys for Plaintiffs

Dated: September 29, 2025

SCHAFF LAW GROUP

By: ***/s/ Jeffrey M. Schaff*** (as authorized on September 29, 2025)
Jeffrey M. Schaff
Attorneys for Plaintiffs

[~~PROPOSED~~] ORDER

Pursuant to the stipulation of Plaintiffs and Defendants COUNTY OF SUTTER and SUTTER COUNTY SHERIFF'S OFFICE (erroneously sued herein as "SUTTER COUNTY SHERIFF'S DEPARTMENT") (collectively, "COUNTY DEFENDANTS"), the COUNTY DEFENDANTS, and any other individually named defendant, including Defendant SHERIFF BRANDON BARNES, represented by the stipulating defense counsel, shall file a response to the Complaint on or before November 26, 2025.

IT IS SO ORDERED.

DATED: October 6, 2025

SEAN C. RIORDAN
UNITED STATES MAGISTRATE JUDGE