1	Scott M. Mahoney (State Bar No. 122254)		
2	Jennifer K. Achtert (State Bar No. 197263) FISHER & PHILLIPS LLP		
3	One Embarcadero Center, Suite 2340 San Francisco, CA 94111-3712		
4	Telephone: (415) 490-9000 Facsimile: (415) 490-9001		
5	Attorneys for Defendant		
6	AMERICAN MEDICAL RESPONSE, INC.		
7			
8	IN THE UNITED STATES DISTRICT COURT		
9	FOR THE EASTERN DISTRICT OF CALIFORNIA		
10	FRESNO DIVISION		
11			
12	KAREN SCHELLER,	Case No.: 1:08-CV-00798 OWW DLB	
13	Plaintiff,	STIPULATION AND ORDER RE: SETTLEMENT AND DISPOSITION	
14	V.	SETTLEMENT AND DISPOSITION	
15	AMERICAN MEDICAL RESPONSE, INC., a foreign corporation, CINDY WOOLSTON,		
16	et al.,	Complaint Filed: February 20, 2008	
17	Defendants.		
18			
19	Plaintiff Karen Scheller and Defendant American Medical Response, Inc., by and		
20	through their attorneys in this regard, upon stipul	ation hereby request an extension of time of	
21	five (5) days to file their Stipulation of Dismissal. In support of this stipulation, the parties state		
22	as follows:		
23	1. On June 30, 2011, Plaintiff submitted a Notice of Settlement in this case,		
24	indicating that the parties anticipated filing a Stipulation for Dismissal within twenty-one (21)		
25	days, pursuant to Local Rule 160.		
26	2. On June 30, 2011, this Court enter	red a Minute Order ordering that a Stipulation	
27	of Settlement and Proposed Order be filed within	twenty-one (21) days.	
28	///		
	STIPULATION AND ORDER RE: SETTLEMENT AND DISP SanFrancisco 117305.1	OSITION 1	

1	3. On July 14, 2011, the parties submitted a Stipulation and [Proposed] Order re:	
2	Settlement and Disposition requesting an extension of time until August 19, 2011 to submit	
3	their Stipulation of Settlement and Proposed Order or other dispositional document.	
4	4. The Court entered an Order providing that extension on July 15, 2011.	
5	5. Despite the parties' diligence, the parties are not yet prepared to file a Stipulation	
6	for Dismissal or other dispositional document, but anticipate being able to do so no later than	
7	August 24, 2011.	
8	WHEREFORE, Plaintiff Karen Scheller and Defendant American Medical Response,	
9	Inc., respectfully submit their stipulation providing the parties with an extension of time until	
10	August 24, 2011, to submit their Stipulation of Settlement and Proposed Order or other	
11	dispositional document.	
12	IT IS SO STIPULATED:	
13	Dated: August 18, 2011 GIANELLI & ASSOCIATES	
14		
15	By: <u>/s/ Brett L. Dickerson_(as authorized 8/18/2011)</u> BRETT L. DICKERSON Attorneys for Plaintiff KAREN SCHELLER	
16	Attorneys for Plaintiff KAREN SCHELLER Dated: August 18, 2011 FISHER & PHILLIPS LLP	
17	Dated. August 18, 2011 FISHER & FHILLIPS LLP	
18	By: <u>/s/ Jennifer K. Achtert</u> JENNIFER K. ACHTERT	
19	Attorneys for Defendant AMERICAN MEDICAL RESPONSE, INC.	
20	AMERICAN MEDICAL RESI ONSE, INC.	
21	ORDER	
22	Based upon the stipulation of the Parties, and good cause having been shown, it is	
23	hereby ORDERED that the Parties shall submit a Stipulation of Settlement and Proposed Order	
24	or other dispositional document in this case on or before August 24, 2011.	
25		
26	IT IS SO ORDERED.	
27	Dated: August 18, 2011 /s/ Oliver W. Wanger	
28	UNITED STATES DISTRICT JUDGE	
	STIPULATION AND ORDER RE: SETTLEMENT AND DISPOSITION 2 SanFrancisco 117305.1 2	

1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
	STIPULATION AND ORDER RE: SETTLEMENT AND DISPOSITION 3 SanFrancisco 117305.1 3