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13 Attorneys for Defendant, Specialty Medical Group Central California

14  
15 **UNITED STATES DISTRICT COURT**  
16 **EASTERN DISTRICT OF CALIFORNIA**

18 PERINATAL MEDICAL GROUP, INC.,  
KRISHNAKUMAR RAJANI, M.D., and  
19 STEPHEN ELLIOT, M.D.,

20 Plaintiffs,

21 v.

22 CHILDREN’S HOSPITAL CENTRAL  
CALIFORNIA, INC., a California corporation;  
23 SPECIALTY MEDICAL GROUP CENTRAL  
CALIFORNIA, INC., a California professional  
24 medical corporation; and CENTRAL  
CALIFORNIA NEONATOLOGY GROUP,  
25 INC., a California professional medical  
26 corporation,

27 Defendants.

Civil Action No. 1:09-cv-1273-LJO-MJS

**SECOND STIPULATION  
EXTENDING DISCOVERY  
DEADLINES**

## I. STIPULATION

1  
2 Plaintiffs PERINATAL MEDICAL GROUP, INC., KRISHNAKUMAR RAJANI, M.D.  
3 and STEPHEN ELLIOT, M.D. and Defendants CHILDREN'S HOSPITAL CENTRAL  
4 CALIFORNIA, SPECIALTY MEDICAL GROUP CENTRAL CALIFORNIA, INC., and  
5 CENTRAL CALIFORNIA NEONATOLOGY GROUP, INC., hereinafter collectively referred  
6 to as "the parties," hereby stipulate to the following:

7 1. Discovery in this matter has been complex, involving numerous parties and third  
8 parties.

9 2. For several months the parties have been exchanging written discovery and  
10 working through their discovery disputes in good faith. However, despite the best efforts by the  
11 parties and counsel the production by all parties of documents, especially electronically stored  
12 information, has taken more time than expected.

13 3. As a result of mutual delays in document production, the parties had to postpone  
14 the start of depositions several months beyond what was originally anticipated. Moreover,  
15 despite the best efforts by the parties and counsel scheduling depositions has proven difficult  
16 given the professional schedules of various party and non-party witnesses, including numerous  
17 physicians. At least 15 depositions have been taken already. At least 24 depositions remain to  
18 be taken, not counting expert witnesses.

19 4. The parties believe a short extension of the pretrial discovery deadlines, and the  
20 related deadline for non-dispositive motions, would assist the just, speedy and inexpensive  
21 determination of this action. Besides permitting the parties to complete discovery in an orderly,  
22 efficient and complete manner, the short extension of approximately 30 days relative to most of  
23 the affected deadlines will enable the parties potentially to minimize or reduce additional  
24 expenses while the parties determine if they are able to or desire to proceed with potential  
25 settlement discussions.

26 5. Therefore, the parties jointly stipulate to the following extensions of the discovery  
27 deadlines set forth in the Court's scheduling order dated June 29, 2010 [Dkt. 60], as previously

1 amended by this Court's Order On Stipulation Extending Discovery Deadlines dated February  
2 11, 2011 [Dkt. 71]:

EVENT	DEADLINE
Disclosure of Expert Witnesses	August 1, 2011
Disclosure of Supplemental and/or Rebuttal Expert Witnesses	August 29 2011
Non-Expert Discovery Deadline	September 1, 2011
Expert Discovery Deadline	September 27, 2011
Non-Dispositive Motion Deadline	Filing: October 1, 2011 Hearing: On or before November 4, 2011

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8 6. The parties are not requesting any other changes to the Court's scheduling order.  
9 Specifically, these changes will not affect the dispositive motion deadline or the trial date set  
10 forth in the scheduling order.

11 **IT IS SO STIPULATED:**

12  
13 Dated: May 26, 2011

LAW OFFICES OF WILLIAM C. HAHESY

14 By: s/ William C. Hahey

15 William C. Hahey  
16 Attorneys for Defendant  
CHILDREN'S HOSPITAL CENTRAL  
CALIFORNIA

17 Dated: May 26, 2011

DAVIS WRIGHT TREMAINE LLP

18 By: s/ Charles S. Wright

19 Charles S. Wright  
20 Attorneys for Defendant  
CHILDREN'S HOSPITAL CENTRAL  
21 CALIFORNIA

22 Dated: May 26, 2011

ATKINSON, ANDELSON, LOYA, RUUD & ROMO

23 By: s/ William M. Woolman

24 William M. Woolman  
25 Attorneys for Defendant  
SPECIALTY MEDICAL GROUP  
26 CENTRAL CALIFORNIA, INC.

27

1 Dated: May 26, 2011

DOERKSEN TAYLOR LLP

2 By: s/ Charles L. Doerksen

3 Charles L. Doerksen

4 Attorneys for Defendant

CENTRAL CALIFORNIA

NEONATOLOGY GROUP, INC.

5 Dated: May 26, 2011

FISHMAN, LARSEN, GOLDRING & ZIETLER

6 By: s/ Michael W. Goldring

7 Michael W. Goldring

8 Attorneys for Defendant

CENTRAL CALIFORNIA

NEONATOLOGY GROUP, INC.

9 Dated: May 26, 2011

CHRISTENSEN & AUER

10 By: s/ Stephen G. Auer

11 Stephen G. Auer

12 Attorneys for Plaintiffs

13 PERINATAL MEDICAL GROUP, INC.,

14 KRISHNAKAMUR RAJANI, M.D., AND

STEPHEN ELLIOTT, M.D.

15 Dated: May 26, 2011

COLEMAN & HOROWITT, LLP

16 By: s/ Darryl J. Horowitt

17 Darryl J. Horowitt

18 Attorneys for Plaintiffs

19 PERINATAL MEDICAL GROUP, INC.,

20 KRISHNAKAMUR RAJANI, M.D., AND

21 STEPHEN ELLIOTT, M.D.

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**UNITED STATES DISTRICT COURT**

**EASTERN DISTRICT OF CALIFORNIA**

PERINATAL MEDICAL GROUP, INC.,  
KRISHNAKUMAR RAJANI, M.D., and  
STEPHEN ELLIOT, M.D.,

Plaintiffs,

v.

CHILDREN’S HOSPITAL CENTRAL  
CALIFORNIA, INC., a California corporation;  
SPECIALTY MEDICAL GROUP CENTRAL  
CALIFORNIA, INC., a California professional  
medical corporation; and CENTRAL  
CALIFORNIA NEONATOLOGY GROUP,  
INC., a California professional medical  
corporation,

Defendants.

Civil Action No. 1:09-cv-1273-LJO-MJS

**ORDER ON SECOND  
STIPULATION EXTENDING  
DISCOVERY DEADLINES**

GOOD CAUSE HAVING BEEN SHOWN AND THE PARTIES HAVING  
STIPULATED TO THE SAME, the Court finds that the above-stated **SECOND  
STIPULATION FOR EXTENSION OF DISCOVERY DEADLINES** is sanctioned by the  
Court, and, based upon that stipulation,

**THE COURT HEREBY ORDERS AS FOLLOWS:**

1. The Court’s scheduling order, and first amendment of that order, is hereby

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1 amended by this second amendment to reflect the parties' stipulation as follows:

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EVENT	AMENDED DEADLINE
Disclosure of Expert Witnesses	August 1, 2011
Disclosure of Supplemental and/or Rebuttal Expert Witnesses	August 29 2011
Non-Expert Discovery Deadline	September 1, 2011
Expert Discovery Deadline	September 27, 2011
Non-Dispositive Motion Deadline	Filing: October 1, 2011 Hearing: On or before November 4, 2011

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10 IT IS SO ORDERED.

11 Dated: June 2, 2011

12 /s/ Michael J. Seng  
13 UNITED STATES MAGISTRATE JUDGE

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