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10
11 **UNITED STATES DISTRICT COURT**
12 **EASTERN DISTRICT OF CALIFORNIA**

13 R. FELLEN, INC., a California
corporation, dba SUNNYSIDE
14 CONVALESCENT HOSPITAL, and
DAKOTA MEDICAL, INC., a California
15 corporation dba GLENOAKS
CONVALESCENT HOSPITAL,
16 individually and on behalf of all others
similarly situated,

17 Plaintiffs,

18 v.

19 REHABCARE GROUP, INC., a Delaware
corporation, and CANNON &
20 ASSOCIATES, LLC, a Delaware limited
liability corporation, dba POLARIS
21 GROUP,

22 Defendants.
23

Case No. 1:14-cv-02081-GEB-SMS

**STIPULATION AND ORDER
EXTENDING TIME FOR
REHABCARE GROUP, INC., TO
RESPOND TO PLAINTIFFS'
DISCOVERY REQUESTS**

24 IT IS HEREBY STIPULATED BY AND BETWEEN Plaintiffs R. FELLEN, INC., dba
25 SUNNYSIDE CONVALESCENT HOSPITAL ("Sunnyside"), and DAKOTA MEDICAL,
26 INC., dba GLENOAKS CONVALESCENT HOSPITAL ("Glenoaks") (Sunnyside and
27
28

1 Glenoaks together referred to as "Plaintiffs") and Defendant REHABCARE GROUP, INC.
2 ("RehabCare") by and through their undersigned counsel:

3 1. On May 5, 2015, RehabCare was served with Plaintiffs' First Request for
4 Production of Documents and Electronically Stored Information, Sunnyside's First Set of
5 Interrogatories, Sunnyside's First Set of Requests for Admissions, and Glenoaks' First Set of
6 Requests for Admissions ("Discovery Requests").
7

8 2. By stipulation dated June 5, 2015, Plaintiffs agreed to extend the time for
9 RehabCare to respond to the Discovery Requests to and including June 29, 2015.

10 3. RehabCare shall have an additional extension of time through July 13, 2015, to
11 serve objections to Plaintiffs' Discovery Requests and/or move for a Protective Order.

12 4. RehabCare shall have an additional extension of time through July 29, 2015, to
13 serve substantive responses to Plaintiffs' Discovery Requests.
14

15 5. RehabCare shall have an additional extension of time through July 29, 2015, to
16 serve any newly discovered objections to Plaintiffs' Discovery Requests or otherwise move for
17 a Protective Order.

18 6. RehabCare shall continue to produce documents responsive to Plaintiffs' rule 34
19 requests on a rolling basis, and shall have an additional extension of time through August 28,
20 2015, to complete that production.
21

22 7. RehabCare shall provide Plaintiffs' counsel with detailed weekly status reports
23 of RehabCare's document production efforts, until document production is complete.

24 8. Based on the list of custodians previously provided to Plaintiffs' counsel,
25 Plaintiffs may provide a list prioritizing the order of custodians for purposes of RehabCare's
26 document review. RehabCare will follow the order of priority provided by Plaintiffs' counsel
27 for any custodians who have not yet been reviewed.
28

1 This Stipulation and Proposed Order is submitted to the Court for review and
2 approval.

3 DATED: July 6, 2015
4

5 ON BEHALF OF OUR RESPECTIVE CLIENTS, WE SO STIPULATE.
6

7 /s Jon M. Wilson

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28 ORDER

Based on the parties' Stipulation and GOOD CAUSE SHOWN:

IT IS ORDERED that the parties' Stipulation is approved, adopted as the Order of the Court, and shall be performed.

IT IS SO ORDERED.

Dated: July 7, 2015

/s/ Sandra M. Snyder
UNITED STATES MAGISTRATE JUDGE

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