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

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

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

22 **STIPULATION AND ORDER
23 EXTENDING TIME FOR
24 REHABCARE GROUP, INC., TO
25 RESPOND TO PLAINTIFFS'
26 DISCOVERY REQUESTS**

27 Plaintiffs,

28 v.

29 REHABCARE GROUP, INC., a Delaware
30 corporation, and CANNON &
31 ASSOCIATES, LLC, a Delaware limited
32 liability corporation, dba POLARIS
33 GROUP,

34 Defendants.

35 IT IS HEREBY STIPULATED BY AND BETWEEN Plaintiffs R. FELLEN, INC., dba
36 SUNNYSIDE CONVALESCENT HOSPITAL ("Sunnyside"), and DAKOTA MEDICAL,
37 INC., dba GLENOAKS CONVALESCENT HOSPITAL ("Glenoaks") (Sunnyside and

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

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

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

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

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

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

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

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

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

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

DATED: July 6, 2015

ON BEHALF OF OUR RESPECTIVE CLIENTS, WE SO STIPULATE.

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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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