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USI ADMINISTRATORS, INC.

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION**

## DAMERON HOSPITAL ASSOCIATION,

Plaintiff,

**USI ADMINISTRATORS, INC. and  
DOES 1 through 50, inclusive.**

## Defendants.

Case No.: 2:01 CV 1788 JAM GGH

**STIPULATION REGARDING DISCOVERY  
PROPOUNDED BY PLAINTIFF, DAMERON  
HOSPITAL ASSOCIATION OF DEFENDANT  
USI ADMINISTRATORS, INC.**

Assigned to Hon. Judge Mendez

Trial Date: January 11, 2010

On February 2, 2009, Plaintiff

“Plaintiff”) pronounced Plaintiff

On February 2, 2009, Plaintiff Dameron Hospital Association (hereinafter “Plaintiff”) propounded Plaintiff’s Interrogatories to Defendant, Set Three; Plaintiff’s Request for Production of Documents, Set Three and Plaintiff’s Request for Admissions, Set One on Defendant USI Administrators, Inc. (hereinafter “Defendant”). Responses to these discovery items were due on March 8, 2009; by stipulation, the parties agreed to a thirty (30) day extension to and including April 8, 2009 for responding to this discovery.

Defendant has requested, and Plaintiff has agreed, to a further extension of time to May 29, 2009 to respond to this discovery. In addition, Defendant has agreed to waive the application of Federal Rule of Civil Procedure 33(a)(1) to the extent that the Third Set of Interrogatories exceeds the 25 interrogatory limitation as provided by that

CBM-SAC\SA070657.1

**STIPULATION AND [PROPOSED] ORDER RE DISCOVERY**

1 Rule. Since this stipulation will extend the time for responding beyond thirty days, an  
2 Order of the Court approving the stipulation is necessary.

3 Accordingly, the parties hereby stipulate to and request that the Court sign the  
4 Order submitted herewith which provides that (1) Defendant, USI Administrators, Inc.  
5 may have to and including May 31, 2009 within which to answer, object of otherwise  
6 respond to the Plaintiff's Interrogatories to Defendant, Set Three; Plaintiff's Request for  
7 Production of Documents, Set Three and Plaintiff's Request for Admissions, Set One and  
8 (2) that the Third Set of Interrogatories may exceed the 25 interrogatory limit provided by  
9 FRCP 33(a)(1).

10 I hereby agree to the terms of the above Stipulation:

11 DATED: April 4, 2009 CARROLL, BURDICK & McDONOUGH, LLP  
12 \_\_\_\_\_/s/ James W. Henderson, Jr.  
13 By: JAMES W. HENDERSON, JR.  
14 Attorneys for USI ADMINISTRATORS, INC.

15 I hereby agree to the terms of the above Stipulation

16 DATED: April 3, 2009 HATTON, PETRIE & STACKLER, APC  
17 \_\_\_\_\_/s/ Gregory M. Hatton  
18 By: GREGORY M. HATTON  
19 Attorneys for DAMERON HOSPITAL  
20 ASSOCIATION  
21 (As authorized on 4/3/09)

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9 Attorneys for Defendant  
10 USI ADMINISTRATORS, INC.

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**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**  
**SACRAMENTO DIVISION**

DAMERON HOSPITAL  
ASSOCIATION,  
Plaintiff,  
v.  
USI ADMINISTRATORS, INC. and  
DOES 1 through 50, inclusive,  
Defendants.

Case No.: 2:01 CV 1788 JAM GGH  
**ORDER GRANTING STIPULATION  
REGARDING DISCOVERY PROPOUNDED BY  
PLAINTIFF, DAMERON HOSPITAL  
ASSOCIATION OF DEFENDANT USI  
ADMINISTRATORS, INC.**

Assigned to Hon. Judge Mendez

Trial Date: January 11, 2010

The parties having so stipulated, and good cause appearing therefore, the Court  
hereby Orders as follows:

1. That the time for Defendant, USI Administrators, Inc., to answer, object  
or otherwise respond to the Plaintiff's Interrogatories to Defendant, Set Three; Plaintiff's  
Request for Production of Documents, Set Three and Plaintiff's Request for Admissions,  
Set One propounded by Plaintiff to Defendant USI Administrators, Inc. is hereby  
continued to and including May 29, 2009.

1                   2. That Rule 33(a)(1), providing a limit of 25 special interrogatories, is  
2 hereby waived for purposes of the Third Set of Interrogatories propounded on Defendant  
3 by Plaintiff.

4 DATED: April 6, 2009

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6                   /s/ John A.Mendez  
7                   HON. JUDGE JOHN A. MENDEZ  
8                   UNITED STATES DISTRICT COURT  
9                   FOR THE EASTERN DISTRICT OF  
10                   CALIFORNIA

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