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Attorneys for Defendant
USI ADMINISTRATORS, INC.

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

**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 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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13 **UNITED STATES DISTRICT COURT**
14 **EASTERN DISTRICT OF CALIFORNIA**
15 **SACRAMENTO DIVISION**
16

17 DAMERON HOSPITAL
18 ASSOCIATION,

19 Plaintiff,

20 v.

21 USI ADMINISTRATORS, INC. and
22 DOES 1 through 50, inclusive,

23 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

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

26 1. That the time for Defendant, USI Administrators, Inc., to answer, object
27 or otherwise respond to the Plaintiff's Interrogatories to Defendant, Set Three; Plaintiff's
28 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.

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

DATED: April 6, 2009

/s/ John A.Mendez
HON. JUDGE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF
CALIFORNIA