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SEIU, United Healthcare Workers - West

18 UNITED STATES DISTRICT COURT

19 EASTERN DISTRICT OF CALIFORNIA

20 SERVICE EMPLOYEES
INTERNATIONAL UNION, UNITED
21 HEALTHCARE WORKERS -- WEST, on
behalf of represented employees,

22 Plaintiff,

23 v.

24 PRIME HEALTH CARE SERVICES,
25 INC.; PRIME HEALTHCARE SERVICES
-- SHASTA, LLC; SHASTA REGIONAL
26 MEDICAL CENTER, INC.; SHASTA
REGIONAL MEDICAL CENTER, LLC;
27 MEDICAL PROPERTIES TRUST; MPT
OF SHASTA, LP; MPT OF SHASTA,
28 LLC; MPT OPERATING

Case No. 2:08-CV-02980-LKK-CMK

**STIPULATION RE MODIFICATION OF
STATUS (PRETRIAL SCHEDULING)
ORDER**

Judge: Hon. Lawrence K. Karlton
Ctrm: 4

1 PARTNERSHIP, LP; and DOES 1 through
2 25,
3 Defendants.

4 Plaintiff Service Employees International Union, United Healthcare Workers – West
5 (“Plaintiff”); Prime Health Care Services, Inc. and Prime Healthcare Services – Shasta LLC
6 (collectively the “Prime Defendants”); and Medical Properties Trust, Inc., MPT of Shasta, LP, MPT
7 of Shasta LLC, and MPT Operating Partnership, LP (collectively the “MPT Defendants”), through
8 their respective counsel of record, stipulate as follows:

9 1. The Status (Pretrial Scheduling) Order (“Scheduling Order”) issued on May
10 12, 2009 may be modified to extend the law and motion completion date from July 11, 2010 to a
11 new date of **July 12, 2010**.

12 2. The summary judgment/summary adjudication motions filed by the Prime
13 Defendants and the MPT Defendants (the “Motions”), which are currently pending and set for
14 hearing on June 21, 2010, may be continued and re-set for to be heard on **July 12, 2010**.

15 3. If the Scheduling Order is modified and the hearing on the Motions is
16 continued to July 12, 2010, Plaintiff’s opposition to the Motions shall be due on **June 14, 2010**, and
17 the Prime Defendants’ and the MPT Defendants’ reply briefs re the Motions shall be due on **June**
18 **28, 2010**.

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1 Dated: June 3, 2010

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/s/ Richard R. Gray
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A Professional Corporation
Attorneys for Defendants
PRIME HEALTHCARE SERVICES, INC.
and PRIME HEALTHCARE SERVICES –
SHASTA, LLC

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Dated: June 3, 2010

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/s/ Trish Higgins
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Attorneys for Defendants
MEDICAL PROPERTIES TRUST, INC.;
MPT OF SHASTA, LP; MPT OF SHASTA,
LLC and MPT OPERATING PARTNERSHIP,
LP

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Dated: June 3, 2010

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/s/ Jordan Mazur
JORDAN MAZUR
WEINBERG, ROGERS & ROSENFELD
A Professional Corporation
Attorneys for Plaintiff
SERVICE EMPLOYEES INTERNATIONAL
UNION, UNITED HEALTHCARE
WORKERS—WEST

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IT IS SO ORDERED


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Dated: June 4, 2010

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LAWRENCE K. KARLTON
SENIOR JUDGE
UNITED STATES DISTRICT COURT

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