

1 JUDITH CLARK MARTIN, STATE BAR NO. 173557
 ROY L. WESTFALL, STATE BAR NO. 249008
 2 **LA FOLLETTE, JOHNSON,**
DE HAAS, FESLER & AMES
 3 655 University Avenue, Suite 119
 Sacramento, California 95825
 4 Phone: (916) 563-3100
 Facsimile: (916) 565-3704
 5 Email: JCMartin@ljdfa.com
 Email: RWestfall@ljdfa.com

6 Attorneys for Defendant,
 7 CATHOLIC HEALTHCARE WEST dba
 MERCY GENERAL HOSPITAL (erroneously
 8 sued and served herein as CATHOLIC HEALTHCARE
 WEST and MERCY GENERAL HOSPITAL)
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 11 UNITED STATES DISTRICT COURT
 12 EASTERN DISTRICT OF CALIFORNIA
 13

14 ANI CHOPOURIAN,)	CASE NO. 2:09-CV-02972-KJM-KJN
)	
15 Plaintiff,)	STIPULATION AND ORDER EXTENDING
)	THE DEADLINES OF THE STATUS
16 v.)	(PRETRIAL SCHEDULING) ORDER
)	
17 CATHOLIC HEALTHCARE WEST,)	
18 MERCY GENERAL HOSPITAL, AND)	
DOES 1 through 20, inclusive,)	
)	
19 Defendants.)	
)	

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 21 Defendant, CATHOLIC HEALTHCARE WEST, MERCY GENERAL HOSPITAL, by
 22 and through their attorney of record, Judith Clark Martin and Plaintiff, ANI CHOPOURIAN, by
 23 and through her attorney of record Lawrance Bohm stipulate to modify this Court’s Status (Pretrial
 24 Scheduling) Order (Doc #20) of February 25, 2010.
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26 **I. EXISTENCE OF GOOD CAUSE**

27 1. Good cause exists in that the attorney for Defendants, Judith Clark Martin is
 28 currently in a jury trial in San Joaquin County Superior Court that is expected to last through early

1 to mid-March, 2011.

2 2. Good cause exists because Defendant still needs to complete plaintiff's deposition
3 and Plaintiff still needs to take depositions of Defendant's witnesses. Defense counsel properly
4 noticed and scheduled plaintiff's deposition for February 7, which did not go forward due to
5 defense counsel's above noted trial. In addition, Plaintiff properly noticed and scheduled
6 depositions for February 2, 3, 4, 8, 9 and 10, which did not go forward due to defense counsel's
7 above noted trial.

8 3. Further good cause exists in that written discovery propounded by plaintiff needs
9 to be responded to by Defendant. In addition, the completion of plaintiff's deposition may reveal
10 additional discovery to be completed. Accordingly, both counsel request modifications to the
11 Court's Status (Pretrial Scheduling) Order so that both parties can adequately prepare this case for
12 trial currently scheduled for September 27, 2011.

13 4. Further, neither party would be prejudiced by the requested modification to the
14 Court's Status (Pretrial Scheduling) Order.

15 **II. STIPULATION**

16 For the foregoing reasons, the parties to this action hereby ***STIPULATE AS FOLLOWS:***

17 1. That the following modifications be made to the Court's Status (Pretrial Scheduling)
18 Order:

	<u>Previous Date:</u>	<u>New Date:</u>
19 Discovery Cut-Off	February 18, 2011	May 18, 2011
20 Last Hearing Date For Motions	April 18, 2011	June 18, 2011
21 Final Pretrial Conference	June 20, 2011 at 2:30 PM	**
22 JOINT Pretrial Statement	June 13, 2011	**

23 **The parties request the court reschedule the Final PreTrial Conference accordingly.

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1 **IT IS SO STIPULATED.**

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3 Dated: LA FOLLETTE, JOHNSON,
4 DE HAAS, FESLER & AMES

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6 By: /s/ Judith Clark Martin
7 JUDITH CLARK MARTIN
8 ROY L. WESTFALL
9 Attorneys for Defendant,
10 CATHOLIC HEALTHCARE WEST
11 dba MERCY GENERAL HOSPITAL
12 (erroneously sued and served herein as
13 CATHOLIC HEALTHCARE WEST
14 and MERCY GENERAL HOSPITAL)
15 655 University Avenue, Suite 119
16 Sacramento, CA 95825
17 (916) 563-3100
18 (916) 565-3704 Facsimile
19 Email: JCMartin@ljdfa.com
20 Email: Rwestfall@ljdfa.com

21 Dated: BOHM LAW GROUP

22 By: /s/ Lawrance A. Bohm
23 LAWRENCE A. BOHM
24 4600 Northgate Blvd., Suite 210
25 Sacramento, CA 95834
26 Attorney for Plaintiff, ANI CHOPOURIAN
27 (916) 927-5574
28 (916) 927-2046 Facsimile
Email: lbohm@bohmlaw.com

21 **IT IS HEREBY ORDERED that:**

22 1. The stipulated dates for discovery cut-off and the last day for filing motions are
23 adopted; and


24 2. The court sets the following dates:

25 The Joint Pretrial Statement is due August 3, 2011;

26 The Final Pretrial Conference will be held on August 10, 2011 at 10:00 a.m. in
27 Courtroom Three; and

Jury Trial is reset to October 3, 2011 at 8:30 a.m. in Courtroom Three.

Dated: February 16, 2011.


UNITED STATES DISTRICT JUDGE

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