

1 LAWRENCE A. BOHM, (SBN 208716)  
 BOHM LAW GROUP  
 2 4600 Northgate Blvd  
 Suite 210  
 3 Sacramento, CA 95834  
 Telephone: (916) 927-5574  
 4 Facsimile: (916) 927-2046

5 ERIKA M. GASPAR, (SBN 238117)  
 LAW OFFICE OF ERIKA M. GASPAR  
 6 2121 Natomas Crossing Drive, Suite 200-399  
 Sacramento, CA 95834  
 7 Telephone (916) 749-0278  
 Facsimile (916) 647-0535  
 8

9 Attorneys for Plaintiff  
 ANI CHOPOURIAN

10 UNITED STATES DISTRICT COURT  
 11 EASTERN DISTRICT OF CALIFORNIA  
 12

13 ANI CHOPOURIAN,

14 Plaintiff,

15 v.

16 CATHOLIC HEALTHCARE WEST,  
 17 MERCY GENERAL HOSPITAL, AND  
 DOES 1 through 20, inclusive,

18 Defendants.  
 19

Case No. 2:09-CV-02972-KJM-KJN

**STIPULATION AND ORDER  
 EXTENDING THE DEADLINES OF  
 THE  
 STATUS (PRETRIAL SCHEDULING)  
 ORDER**

21 Plaintiff, ANI CHOPOURIAN, by and through her attorneys of record, Lawrance A.

22 Bohm and Erika M. Gaspar and Defendant, CATHOLIC HEALTHCARE WEST, by and through  
 23 their attorney of record Judith Clark Martin stipulate to modify this Court's Status (Pretrial  
 24 Scheduling) Order (Doc #20) of February 25, 2010 as modified by the Court on February 16,  
 25 2011 (Doc #27).  
 26  
 27  
 28

1 **I. EXISTENCE OF GOOD CAUSE**

2 1. Good cause exists in that despite diligent efforts, the parties have been unable to  
3 reschedule deposition of witnesses because of the trial schedules of attorneys for the parties.  
4 Attorney for Defendants Judith Clark Martin was unavailable for depositions in February as she  
5 was in trial in San Joaquin County Superior Court. Plaintiff's attorneys, Lawrance A. Bohm and  
6 Erika M. Gaspar were assigned out to trial in Sacramento County Superior Court on March 15,  
7 2011 on a case which was anticipated to continue into April. The case settled on March 28, 2011.  
8 Attorney for Defendants Judith Clark Martin is unavailable for depositions in April. Further, Mr.  
9 Bohm and Ms. Martin are both in trial on another matter in Butte County Superior Court from  
10 May 9 -19, 2011.  
11

12 2. Good cause exists because Plaintiff still needs to take depositions of Defendants'  
13 witnesses which were properly noticed and scheduled for February 2, 3, 4, 8, 9 and 10, and which  
14 Plaintiff has been unable to reschedule due to the scheduling conflicts of the attorneys as noted  
15 above.  
16

17 3. Good cause exists in that Defendant is completing Plaintiff's deposition on  
18 Monday, April 4, 2011, and the completion of Plaintiff's deposition may reveal additional  
19 discovery to be completed. Accordingly, both counsel request modifications to the Court's Status  
20 (Pretrial Scheduling) Order so that both parties can adequately prepare this case for trial currently  
21 scheduled for October 3, 2011.  
22

23 4. Further good cause exists in that the date for disclosure of expert witnesses and  
24 completion of expert discovery was not previously provided by the Court.

25 5. Further, neither party would be prejudiced by the requested modification to the  
26 Court's Status (Pretrial Scheduling) Order.

27 ///  
28

1 **II. STIPULATION**

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

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

	<b>Previous Date:</b>	<b>New Date:</b>	
5			
6			
7	Non Expert Discovery Cut-Off	May 18, 2011	July 5, 2011
8	Expert Disclosure Date	no date provided	July 19, 2011
9	Expert Discovery Cut-Off	no date provided	August 12, 2011
10	Final Pretrial Conference	August 10, 2011 at 10:00 a.m. **	
11	JOINT Pretrial Statement	August 3, 2011**	
12			

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

14 Dated: April 6, 2011

15 By: /s/ Lawrance A. Bohm  
Lawrance A. Bohm, Esq.  
Erika M. Gaspar, Esq.  
Attorneys for Plaintiff  
ANI CHOPOURIAN

18 By: /s/ Judith Clark Martin  
19 Judith Clark Martin  
20 Roy L. Westfall  
21 Attorneys for Defendant,  
CATHOLIC HEALTHCARE WEST

22  
23 The court adopts the schedule proposed above and sets the final pretrial conference  
24 for August 25, 2011, with the joint pretrial statement due August 17, 2011.

25 IT IS SO ORDERED:

26 Date: April 6, 2011.

27   
28 \_\_\_\_\_  
UNITED STATES DISTRICT JUDGE