

REED SMITH LLP

A limited liability partnership formed in the State of Delaware

1 JUDITH CLARK MARTIN, STATE BAR NO. 173557  
MARY E. "MOLLY" GREENE, STATE BAR NO. 186205

2 **LA FOLLETTE, JOHNSON,**  
3 **DE HAAS, FESLER & AMES**  
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 RAYMOND A. CARDOZO, STATE BAR NO. 173263  
7 rcardozo@reedsmith.com  
MARGARET A. GRIGNON, STATE BAR NO. 67721  
8 mgrignon@reedsmith.com  
PAUL D. FOGEL, STATE BAR NO. 70859  
9 pfogel@reedsmith.com

10 **REED SMITH LLP**  
101 Second Street, Ste. 1800  
San Francisco, CA 94105  
11 Telephone: 415 543 8700  
Facsimile: 415 391 8269

12  
13 Attorneys for Defendant,  
14 CATHOLIC HEALTHCARE WEST dba  
15 MERCY GENERAL HOSPITAL (erroneously  
sued and served herein as CATHOLIC HEALTHCARE  
WEST and MERCY GENERAL HOSPITAL)

17 UNITED STATES DISTRICT COURT

18 EASTERN DISTRICT OF CALIFORNIA

19 ANI CHOPOURIAN,  
20 Plaintiff,

21 v.

22 CATHOLIC HEALTHCARE WEST,  
23 MERCY GENERAL HOSPITAL, AND  
24 DOES 1 through 20, inclusive,  
25 Defendants.

) CASE NO. 2:09-CV-02972-KJM-KJN  
)  
) **STIPULATION TO STAY EXECUTION**  
) **ON JUDGMENT AND DEFERRING**  
) **DEADLINE TO SEEK RECOVERY OF**  
) **COSTS AND ATTORNEY'S FEES**  
) **PENDING POST-TRIAL MOTIONS;**  
) **ORDER**

) **Honorable Kimberly J. Mueller**  
)  
)

26 After the Court enters judgment, the parties anticipate that Defendant will file motions for  
27 judgment as a matter of law and/or for a new trial and/or for a remittitur. Defendant desires a stay of  
28

1 execution of the judgment until after such motions are decided by the Court, and Plaintiff desires to  
2 defer her filing of a costs bill and motion for attorney's fees until after such motions are decided.  
3 Accordingly, the parties stipulate that (1) execution on the judgment shall be stayed until 30 days  
4 after the Court enters its order(s) disposing of Defendant's motions for new trial and/or JMOL  
5 and/or for a remittitur, and (2) any applicable deadlines for filing a costs bill or motion for attorney's  
6 fees shall be extended until 30 days after the Court enters its order(s) disposing of Defendant's  
7 motions for new trial and/or JMOL and/or for a remittitur .

8  
9 Dated: April 2, 2012.

LA FOLLETTE, JOHNSON,  
DE HAAS, FESLER & AMES

REED SMITH LLP

By:           /s/ Raymond A. Cardozo            
RAYMOND A. CARDOZO

Attorneys for Defendant CATHOLIC HEALTHCARE  
WEST dba MERCY GENERAL HOSPITAL  
(erroneously sued and served herein as CATHOLIC  
HEALTHCARE WEST and MERCY GENERAL  
HOSPITAL)

16  
17 Dated: April 2, 2012.

BOHM LAW GROUP

THE LAW OFFICES OF GREGORY R.  
DAVENPORT

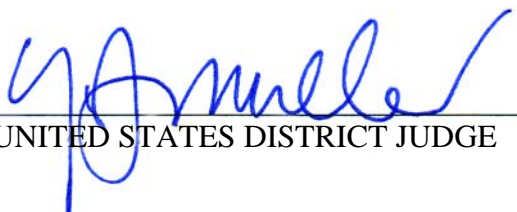
LAW OFFICE OF ERIKA M. GASPAR

By:           /s/ Lawrence A. Bohm            
LAWRENCE A. BOHM

Attorneys for Plaintiff Ani Chopourian

24 IT IS SO ORDERED.

25  
26 Dated: April 3, 2012.

  
UNITED STATES DISTRICT JUDGE