

1 GERI LYNN GREEN (SBN 127709)
 LAW OFFICE OF GERI LYNN GREEN
 2 4 Embarcadero Center, Suite 1400
 San Francisco, California 94111
 3 Tel: (415) 982-2600
 Fax: (415) 358-4562
 4 greenlaw700@gmail.com
gerilynnngreen@gmail.com

5 Attorneys for Plaintiff
 6 SANDIPKUMAR TANDEL

7 LONGYEAR, O’DEA & LAVRA, LLP
 8 VAN LONGYEAR, CSB NO. 84189
 PETER C. ZILAFF, CSB NO. 272658
 9 3620 American River Drive, Suite 230
 Sacramento, California 95864-5923
 10 Tel: 916-974-8500 Fax: 916 974-8510

11 Attorneys for Defendants County of Sacramento,
 John McGinness, Deputy Stephanie Jacoby, Deputy Mark Medeiros

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

16 SANDIPKUMAR TANDEL,

17 Plaintiffs,

18 v.

19 COUNTY OF SACRAMENTO, et al,

20 Defendants.

Case No. **2:11-CV-00353-MCE AC**

**JOINT RESPONSE TO ORDER TO SHOW
 CAUSE (ECF 198); STIPULATION; AND
 ORDER FOR EXTENSION OF TIME TO FILE
 DISMISSAL**

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 23 Plaintiff, Sandipkumar Tandel, is represented by Geri Green of the Law Office of Geri
 24 Lynn Green. Defendants, County of Sacramento, John McGinness, Deputy Stephanie Jacoby and
 25 Deputy Mark Medeiros are represented by Van Longyear and Peter C. Zilaff of Longyear, O’Dea
 26 & Lavra, LLP.

27 The parties have met and conferred and stipulate to extending the time for filing the
 28 dismissal in this matter. The current deadline for filing the dismissal pursuant to the Court’s

1 Order (ECF No. 197) was August 2, 2016. An extension of time to file closing documents and
2 the dismissal is necessary due to the extended negotiations with Medicare. The parties stipulate
3 to and request an extension of ninety days.

4 Counsel for Plaintiff apologizes to the Court for failing to apprise the Court of the need
5 for additional time to file dispositional documents before August 2, 2016. That date had been
6 calendared in Counsel's office computerized calendar which generally synchronizes with
7 counsel's Smart Phone calendar. However, during a recent move of the computer equipment, the
8 server suffered a malfunction and has yet to be operating properly. It is respectfully requested
9 that this Court not impose sanctions as counsel are diligently working to secure the necessary
10 information to finalize the settlement.

11 In order to complete the settlement, both sides require a final payment amount from
12 Medicare. Counsel for Mr. Tandel has been in contact with Medicare after submitting the
13 necessary paperwork, and back up documents months ago. When last she spoke with Medicare
14 on August 17, 2016, she was informed that the case had finally been reviewed, the review
15 completed, and that the reviewer was in the process of "preparing a letter". She was told the
16 letter should be received within 14 days. If it did not arrive in that time, she was told to call
17 back. If the letter did not resolve the matter, she was told that she may need to supply additional
18 information.

19 In light of time Medicare requires to respond, it is respectfully requested that the Court set
20 the date for the filing of disposition documents to November 4, 2016.

21 Counsel has spoken with Defense Counsel who does not oppose this motion as they
22 require the same information from Medicare to finalize the settlement.

23 Consequently, it is herein respectfully requested that the Court not impose sanctions or
24 dismiss the case and, instead, continue the matter to November 2, 2016.

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1 Accordingly, the parties through their counsel stipulate to and request an order extending
2 the deadline to file closing documents to November 2, 2016.

3 Dated: August 23, 2016

LAW OFFICE OF GERI LYNN GREEN

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5 /S/: Geri Green

6 GERI GREEN
7 Attorney for Plaintiff
8 Sandipkumar Tandel

9 Dated: August 23, 2016

LONGYEAR, O'DEA & LAVRA, LLP

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11 /S/: Peter C. Zilaff


12 VAN LONGYEAR
13 PETER C. ZILAFF
14 Attorneys for Defendants,
15 County of Sacramento, et al.

16 **ORDER**

17 Good cause appearing and pursuant to the foregoing stipulation, the deadline to file
18 dispositional documents shall be November 2, 2016. No sanctions are ordered.

19 IT IS SO ORDERED:

20 Dated: August 24, 2016

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22 MORRISON C. ENGLAND, JR.
23 UNITED STATES DISTRICT JUDGE
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