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

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

15 SANDIPKUMAR TANDEL,
 Plaintiffs,
 16 v.
 17 COUNTY OF SACRAMENTO, et al,
 Defendants.

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

**STIPULATION; AND ORDER FOR
 EXTENSION OF TIME TO FILE
 DISMISSAL**

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

24 The parties have met and conferred and stipulate to extending the time for filing the
 25 dismissal in this matter. The current deadline for filing the dismissal pursuant to the Court's
 26 Order (ECF No. 200) is November 2, 2016. Another extension of time to file closing documents
 27 and the dismissal is necessary due to the extended negotiations with Medicare. The parties
 28 stipulate to and request an extension of ninety days.

1 In order to complete the settlement, both sides require a final payment amount from
2 Medicare. Due to the rarity and lack of knowledge of Neuro Myelitis Optica, the disease which
3 has caused Plaintiff's profound spinal cord damage, the agency is engaging in lengthy and
4 detailed reviews of information. Consequently, Plaintiff's counsel has continued providing the
5 agency with information, however it is taking an inordinate amount of time to resolve this issue.
6 In light of time Medicare requires to respond, it is respectfully requested that the Court set the
7 date for the filing of disposition documents to February 2, 2017.

8 Accordingly, the parties, through their counsel, stipulate to and request an order extending
9 the deadline to file closing documents to February 2, 2017.

10 Dated: November 1, 2016

LAW OFFICE OF GERI LYNN GREEN

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12 /S/: Geri Green

GERI GREEN

Attorney for Plaintiff

Sandipkumar Tandel

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16 Dated: November 1, 2016

LONGYEAR, O'DEA & LAVRA, LLP

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18 /S/: Van Longyear

VAN LONGYEAR

Attorneys for Defendants,


County of Sacramento, et al.

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21 **ORDER**

22 Pursuant to the parties' stipulation, and good cause appearing, the deadline to file
23 dispositional documents is extended to February 2, 2017.

24 IT IS SO ORDERED:

25 Dated: November 7, 2016

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MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE