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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,

16 Plaintiffs,

17 v.

18 COUNTY OF SACRAMENTO, et al,

19 Defendants.

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

**STIPULATION; AND ORDER FOR
 EXTENSION OF TIME TO FILE
 DISMISSAL TO APRIL 3, 2017**

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. 202) is February 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 sixty 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 April 3, 2017.

8 Accordingly, the parties, through their counsel, stipulate to and request an order extending
9 the deadline to file closing documents to April 3, 2017.

10 Dated: February 2, 2017

LAW OFFICE OF GERI LYNN GREEN

11
12 /S/: Geri Green

GERI GREEN

13 Attorney for Plaintiff

14 Sandipkumar Tandel

15
16 Dated: February 2, 2017

LONGYEAR, O'DEA & LAVRA, LLP

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18 /S/: Van Longyear

VAN LONGYEAR

19 Attorneys for Defendants,

20 County of Sacramento, et al.
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ORDER

Pursuant to the parties' stipulation and good cause appearing, the Court orders that the deadline to file dispositional documents shall be extended to April 3, 2017.

IT IS SO ORDERED.

Dated: February 2, 2017


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE

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