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

11
 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 TO MAY 3, 2017**

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

23 The parties have met and conferred and stipulate to extending the time for filing the
 24 dismissal in this matter. The current deadline for filing the dismissal pursuant to the Court's
 25 Order (ECF No. 204) is April 3, 2016. Another extension of time to file closing documents and
 26 the dismissal is necessary due to the extended negotiations with Medicare and Medi-Cal. The
 27 parties stipulate to and request an extension of thirty days.

28 In order to complete the settlement, both sides require a final payment amounts from

1 Medicare and Medi-Cal. Both Medicare and Medi-Cal have determined that they will not pursue
2 any lien, however Medi-Cal is still in the process of preparing a letter of confirmation.
3 Consequently, it is respectfully requested that the Court set the date for the filing of disposition
4 documents to May 3, 2017 in order to finalize all the paperwork.

5 Accordingly, the parties, through their counsel, stipulate to and request an order extending
6 the deadline to file closing documents to May 3, 2017.

7 Dated: April 5, 2017

LAW OFFICE OF GERI LYNN GREEN

8
9 /S/: Geri Green

10 GERI GREEN
11 Attorney for Plaintiff
Sandipkumar Tandel

12
13 Dated: April 5, 2017

LONGYEAR, O'DEA & LAVRA, LLP

14
15 /S/: Van Longyear

16 VAN LONGYEAR
17 Attorneys for Defendants,
18 County of Sacramento, et al.

19 **ORDER**

20 Pursuant to the stipulation of the parties and good cause appearing, the deadline by which
21 the parties shall file dispositional documents shall be continued to May 3, 2017.

22 IT IS SO ORDERED.

23 Dated: April 5, 2017

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25 
26 MORRISON C. ENGLAND, JR.
27 UNITED STATES DISTRICT JUDGE
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