

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

LONGYEAR, O'DEA & LAVRA, LLP
Van Longyear, CSB No. 84189
Jennifer Marquez, CSB No. 232194
3620 American River Drive, Suite 230
Sacramento, California 95864-5923
Tel: (916)974-8500 Fax: (916)974-8510
Attorneys for Defendants County of
Sacramento, John McGinness, Ann Marie
Boylan, Michael Sotak, M.D., Susan
Kroner RN, Agnes R. Felicano NP,
James Austin NP, John Ko, M.D., Goli
Sahba, M.D., John Wilson, Robert Bauer,
M.D., Asa Hambly, M.D., Hank Carl,
RN. Tracie Keillor and Pablito Gaddis

PORTER SCOTT
A PROFESSIONAL CORPORATION
Norman V. Prior, CSB No. 125457
350 University Avenue, Suite 200
Sacramento, CA 95825
Tel: (916)929-1481 Fax: (916)927-3706
Attorneys for Defendants, Chris Smith,
M.D.

THE LAW OFFICES OF GERI LYNN GREEN, LC
Geri Lynn Green, CSB No. 127709
Julien Swanson, CSB No. 193957
155 Montgomery Street, Ste. 901
San Francisco, CA 94104
Tel: (415) 982-2600 Fax: (415)358-4562
Attorneys for Plaintiff

THE LAW OFFICES OF DENNISE S. HENDERSON
Dennise Henderson, CSB No. 208640
1903 Twenty-First Street
Sacramento, CA 95811
Tel: (916)456-2027
Attorneys for Plaintiff

WILKE, FLEURY, HOFFELT, GOULD &
BIRNEY, LLP
Robert F. Tyler, Jr., CSB No. 063055
400 Capitol Mall, 22nd Floor
Sacramento, CA 95814
Tel: (916) 441-2430 Fax: (916)442-6664
Attorneys for Defendants, Gregory Sokolov, MD,
Keelin Garvey, MD

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

SANDIPKUMAR TANDEL,

Plaintiff,

vs.

COUNTY OF SACRAMENTO, et al.,

Defendants.

CASE NO. 2:11-cv-00353 MCE GGH

[Consolidated with Case No. 2:09-cv-00842 MCE GGH]

**REOUEST AND STIPULATION FOR
EXTENSION OF TIME TO FILE A
JOINT STATUS REPORT; ORDER**

Plaintiff, Sandipkumar Tandel, is represented by Geri Green of the Law Offices of Geri
Lynn Green, LC and Dennise S. Henderson of the Law Office of Dennise S. Henderson.
Defendants, County of Sacramento, Sheriff John McGinness, Ann Marie Boylan, Asa Hambly,
M.D., Hank Carl, RN and Michael Sotak, M.D., James Austin, John Wilson, Susan Kroner,

1 Agnes Felicano, John Ko M.D. and Goli Sahba M.D. are represented by Van Longyear and
2 Jennifer Marquez of Longyear, O’Dea & Lavra, LLP. Defendant Chris Smith, M.D. is
3 represented by Norm V. Prior and Kimberly L. Kakavas of Porter Scott. Defendants Gregory
4 Sokolov and Keelin Garvey, M.D. are represented by Robert Tyler of Wilke, Fleury, Hoffelt,
5 Gould & Birney, LLP.
6

7 The current deadline for the parties to file a Joint Status Report is August 8, 2011.

8 On June 21, 2011, Defendants County of Sacramento, John McGinness, Ann Marie
9 Boylan, Michael Sotak, M.D., Susan Kroner RN, Agnes R. Felicano NP, James Austin NP, John
10 Ko, M.D, Goli Sahba, M.D, Richard L. Bauer, M.D., and Officer John Wilson moved to dismiss
11 Plaintiff Sandipkumar Tandel’s First Amended Complaint (FAC), filed in case number 2:11-cv-
12 0353 MCE GGH, Docket No. 22, pursuant to FRCP 12(b)(6), which is currently scheduled to be
13 heard on August 25, 2011.¹
14

15 On July 22, 2011, Defendants County of Sacramento, John McGinness, Ann Marie
16 Boylan, Asa Hambly, M.D, Hank Carl RN, Sergeant Tracie Keillor, Deputy Pablito Gaddis, and
17 moved to dismiss Plaintiff Sandipkumar Tandel’s Second Amended Complaint (SAC), filed in
18 case number 2:09-cv-00842 MCE GGH, Docket No. 43, pursuant to FRCP 12(b)(6), which is
19 currently scheduled to be heard on August 25, 2011.
20

21 Defendant Chris Smith, M.D. filed a motion to dismiss Plaintiff Sandipkumar Tandel’s
22 Second Amended Complaint (SAC), filed in case number 2:09-cv-00842 MCE GGH, which
23 currently scheduled to be heard on September 29, 2011.

24 Since there are motions to dismiss pending in both cases, the parties request an extension
25 of time for sixty (60) days to file a Joint Status Report.
26

27 _____
28 ¹ The parties have stipulated to have all motions to dismiss jointly heard on September 6, 2011. A
request and stipulation will be filed with the Court.

1 IT IS HEREBY STIPULATED between the parties that the current deadline of August 8,
2 2011 to file a Joint Status Report be extended to October 7, 2011 to allow for the resolution of
3 the pending motions to dismiss.
4

5
6 IT IS SO STIPULATED.

7 Dated: August 4, 2011

LAW OFFICES OF GERI LYNN GREEN, LC

8
9 By: /s/ Geri Lynn Green

GERI LYNN GREEN
JULIEN SWANSON
Attorneys for Plaintiff

10
11
12 Dated: August 4, 2011

LAW OFFICES OF DENNISE HENDERSON

13
14 By: /s/ Dennise Henderson

DENNISE HENDERSON
Attorney for Plaintiff

15
16 Dated: August 4, 2011

LONGYEAR, O'DEA & LAVRA, LLP

17
18 By: /s/ Jennifer Marquez

VAN LONGYEAR
JENNIFER MARQUEZ
Attorneys for Defendants, County of Sacramento
John McGinness, Ann Marie Boylan,
Michael Sotak, M.D., Susan Kroner RN,
Agnes R. Felicano NP, James Austin NP,
John Ko, M.D., Goli Sahba, M.D., Officer John
Wilson, Robert Bauer, M.D., Asa Hambly, M.D.,
Hank Carl, RN Sergeant Tracie Keillor and Deputy
Pablito Gaddis

19
20
21
22
23
24 Dated: August 4, 2011

PORTER SCOTT

25
26 By: /s/ Norman V. Prior; /s/ Kimberly Kakavas

NORMAN V. PRIOR
KIMBERLY L. KAKAVAS
Attorneys for Defendant Chris Smith, M.D.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


Dated: August 4, 2011

WILKE, FLEURY, HOFFELT, GOULD & BIRNEY, LLP

By: /s/ Robert F. Tyler, Jr.
ROBERT F. TYLER, JR.
Attorneys for Defendants Gregory Sokolov and
Keelin Garvey, M.D.

IT IS SO ORDERED.

August 5, 2011


MORRISON C. ENGLAND, JR
UNITED STATES DISTRICT JUDGE