

1 KAMALA D. HARRIS, State Bar No. 146672  
 Attorney General of California  
 2 CHRISTOPHER J. BECKER, State Bar No. 230529  
 Supervising Deputy Attorney General  
 3 DIANA ESQUIVEL, State Bar No. 202954  
 Deputy Attorney General  
 4 1300 I Street, Suite 125  
 P.O. Box 944255  
 5 Sacramento, CA 94244-2550  
 Telephone: (916) 445-4928  
 6 Facsimile: (916) 324-5205  
 E-mail: [Diana.Esquivel@doj.ca.gov](mailto:Diana.Esquivel@doj.ca.gov)

7  
 8 *Attorneys for Defendants Allen, Bangi, Krpan, and  
 St. Clair*

9 IN THE UNITED STATES DISTRICT COURT  
 10 FOR THE EASTERN DISTRICT OF CALIFORNIA  
 11 SACRAMENTO DIVISION

13 **LINNIE STAGGS, as Administrator of the**  
 14 **ESTATE OF ROBERT E. STAGGS,**  
 15 **deceased, et al. ,**

16 Plaintiffs,

17 v.

18 **DOCTOR'S HOSPITAL OF MANTECA,**  
 19 **INC., et al.,**

20 Defendants.

No. 2:11-cv-00414 MCE-KJN

**STIPULATION AND ORDER FOR TEN-  
 DAY EXTENSION FOR DEFENDANTS  
 TO FILE THEIR ANSWER TO THE  
 CORRECTED FOURTH AMENDED  
 COMPLAINT**

Action Filed: February 14, 2011

21 Under Federal Rules of Civil Procedure 6(b) and 15(a)(3) and Local Rules 143 and 144(a),  
 22 Plaintiff and Defendants Allen, Bangi, Krpan, and St. Clair (CDCR Defendants), by and through  
 23 their counsel of record, agree to a ten-day extension for CDCR Defendants to file their answer to  
 24 the corrected fourth amended complaint, filed on November 30, 2015. (ECF No. 117.) The  
 25 response is currently due on December 14, 2015.

26 When an act must be done within a specified time, the court may, for good cause, extend  
 27 the time with or without motion or notice if the court acts, or if a request is made, before the  
 28 original time expires. Fed. R. Civ. P. 6(b)(1)(A), 15(a)(3) (stating, in pertinent part, that a

1 response to an amended pleading is due fourteen days after service unless the court orders  
2 otherwise). Good cause exists to grant this motion because CDCR Defendants require more time  
3 to prepare their answer. Defense counsel will be unable to complete the answer by the current  
4 deadline due to working on more immediate deadlines in her other cases, including trial-related  
5 documents. Also, defense counsel needs more time to finish reviewing the relevant medical  
6 records to be able to adequately respond to the allegations in the amended pleading. The parties  
7 therefore agree to a ten-day extension, up to and including December 24, 2015, for CDCR  
8 Defendants to file their answer.

9 IT IS SO STIPULATED.

10 Dated: December 14, 2015

Respectfully submitted,

11 KAMALA D. HARRIS  
12 Attorney General of California  
13 CHRISTOPHER J. BECKER  
14 Supervising Deputy Attorney General

15 */s/ Diana Esquivel*

16 DIANA ESQUIVEL  
17 Deputy Attorney General  
18 *Attorneys for Defendants*

19 Dated: December 14, 2015

U.C. DAVIS CIVIL RIGHTS CLINIC

20 */s/ Carter C. White*

21 CARTER C. WHITE  
22 Supervising Attorney  
23 *Attorneys for Plaintiffs*

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

**ORDER**

Good cause appearing, the parties' stipulated request for a ten-day extension for Defendants Allen, Bangi, Krpan, and St. Clair to respond to the fourth amended complaint is GRANTED.

Defendants shall file their answer on or before December 24, 2015.

IT IS SO ORDERED.

Dated: December 15, 2015



---

MORRISON C. ENGLAND, JR., CHIEF JUDGE  
UNITED STATES DISTRICT COURT