	<ul> <li>Michael R. Mordaunt, Esq., Bar No. 66911</li> <li>Stephanie Roundy, Esq., Bar No. 211871</li> <li>RIGGIO MORDAUNT &amp; KELLY</li> <li>A Professional Law Corporation</li> </ul>				
	3 4	2509 West March Lane, Suite 200 Stockton, CA 95207 Telephone: (209) 473-8732			
	5 Attorneys for Defendants				
	6	MARIO P. SATTAH, M.D., LINCOLN RUSSIN, M.D.			
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1		UNITED STATES DISTRICT COURT			
	11	EASTERN DISTRICT OF CALIFORNIA			
12		SACRAMENTO DIVISION			
	13	LINNIE STAGGS, as Administrator of )	Case No. 2:11-CV-00414-MCE-KJN		
	14	the ESTATE OF ROBERT E. STAGGS, ) deceased, and MELISSA STAGGS	STIPULATION FOR CONTINUANCE OF		
	15	Plaintiff(s),	PLAINTIFFS' MOTION TO STRIKE AFFIRMATIVE DEFENSES AND PROPOSED		
	16	VS. (5), (5), (5), (5), (5), (5), (5), (5),	ORDER		
	17	DOCTOR'S HOSPITAL OF	Action Filed: February 14, 2011		
	18	MANTECA, INC., IVAN CLAY, ) Warden, TIM VIRGA, Interim Warden, )	richon i neu. i coruny i i, 2011		
	19	FRANK X. CHAVEZ, Warden, ) SHARON AUNGST, JACK ST. )			
	20	CLAIR, M.D., CURTIS ALLEN, M.D., ) EDWIN BANGI, M.D., JOHN KRPAN, )			
	21	D.O., JONATHAN BENAK, PA, ) LINCOLN RUSSIN, M.D., JAMES P. )			
	22	OWEN, M.D., MARIO P. SATTAH, () M.D. and DOES 1 through 100, ()			
	23	inclusive )			
	24	Defendant(s).			
	25	,			
	26	Pursuant to Local Rules 143, 144 and 230(f), plaintiffs and defendants Lincoln Russin,			
Riggio Mordaunt & Kelly 2509 W March Lane	27	M.D. and James P. Owen, M.D., by and through their counsel of record, agree to continue the			
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		STIPULATION FOR CONTINUANCE OF PLAINTIFF'S			

MOTION TO STRIKE AFFIRMATIVE DEFENSES AND PROPOSED ORDER

1	hearing on plaintiffs' Motion to Strike Affirmative Defenses (ECF No. 126) to February 25, 2016
2	at 2:00 p.m. in Courtroom 7. The motion is currently scheduled for January 28, 2016. There have
3	not been any previous continuances of this motion.

4	4 Defense counsel currently represents three defendants, Mario Sattah, M.D., Lincoln Rus			
5	M.D. and James P. Owen, M.D. There is good cause to continue the Motion to Strike because new			
6	defense counsel is being obtained for two of these three defendants. The continuance is necessary			
7	in order to retain new defense counsel and allow new counsel to become familiar with the case and			
8	issues relevant to the motion to strike. Good cause to continue the hearing also exists to allow time			
9	for new defense counsel to meet and confer with plaintiffs' counsel as to issues raised in the motion			
10	<ul> <li>10 to strike. The parties stipulate to a continuance of the hearing on plaintiff's Motion to Strike</li> <li>11 Affirmative Defenses to February 25, 2016 at 2:00 p.m. in Courtroom 7.</li> <li>12 The parties further stipulate that the dates for filing opposition and reply papers are to be</li> <li>13 based on the new hearing date of February 25, 2016.</li> <li>14 IT IS SO STIPULATED.</li> </ul>			
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15	Dated: December 29, 2015	RIGGIO MORDAUNT & KELLY		
16				
17	]	By: <u>(S) <i>Stephanie Roundy</i></u> Stephanie Roundy, Esq.		
18		Attorneys for Defendant MARIO P. SATTAH, M.D. LINCOLN		
19		RUSSIN, M.D. and JAMES P. OWEN, M.D.		
20		141.D.		
21	Dated: December, 2015	U.C. DAVIS CIVIL RIGHTS CLINIC		
22		By:(S) Carter C. White		
23		Carter C. White, Esq. Supervising Attorney		
24		Attorneys for Plaintiffs		
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27 Riggio Mordaunt & Kelly 2509 W March Lane				
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	STIPULATION FOR CONTINUANCE OF PLAINTIFF'S MOTION TO STRIKE AFFIRMATIVE DEFENSES AND PROPOSED ORDER			

	ORDER	
	2 Good cause appearing, the parties' stipulated request for a continuance of the hearing on	
	<ul> <li>3 plaintiffs' Motion to Strike Affirmative Defenses to February 25, 2016 at 2:00 p.m. in Courtrood</li> <li>4 (ECF No. 128) is GRANTED.</li> <li>5 The dates for filing opposition and reply papers are to be based on the new hearing date</li> <li>6 February 25, 2016.</li> </ul>	
	7 IT IS SO ORDERED.	
	Dated: January 11, 2016	
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1	MORRISON C. ENGLAND, JR., CHIEF JUDGE	
1	UNITED STATES DISTRICT COURT	
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2509 W March Lane Suite 200 2 Stockton, CA 95207 (209) 473-8732	3	
	STIPULATION FOR CONTINUANCE OF PLAINTIFF'S	

STIPULATION FOR CONTINUANCE OF PLAINTIFF'S MOTION TO STRIKE AFFIRMATIVE DEFENSES AND PROPOSED ORDER