

DUMMIT, BUCHHOLZ & TRAPP

Attorneys At Law
1661 Garden Highway
Sacramento, California 95833
Telephone (916) 929-9600
Fax (916) 927-5369
Daniela P. Stoutenburg - State Bar No. 183785
Randall R. McKinnon - State Bar No. 97723
Attorneys for

Defendant DOCTORS HOSPITAL OF MANTECA

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

LINNIE STAGGS, as Administrator of the
ESTATE OF ROBERT E. STAGGS,
deceased, and MELISSA STAGGS

Plaintiffs

-vs-

DOCTORS HOSPITAL OF MANTECA,
INC.; IVAN D. CLAY, Warden; TIM
VARGA, Interim Warden; FRANK X
CHAVEZ, Warden; SHARON AUNGST;
JACL ST. CLAIR, MD.; CURTIS ALLEN,
M.D.; EDWIN BANGI, M.D.; JOHN
KRPAN, D.O.; JONATHAN BENAK, P.S.;
LINCOLN RUSSIN, M.D.; JAMES P.
OWEN, M.D.; MARIO P. SATTAH, M.D.;
and DOES 1 Through 100, Inclusive

Defendants.

Case No. 2:11-CV-00414-MCE-KJN

**STIPULATION FOR 10-DAY EXTENSION
FOR DEFENDANT DOCTORS HOSPITAL
OF MANTECA TO FILE ITS RESPONSE
TO PLAINTIFFS' FIRST AMENDED
COMPLAINT; ORDER**

Defendant DOCTORS HOSPITAL OF MANTECA (hereinafter "DHM") was served with Plaintiffs' First Amended Complaint on June 13, 2011 and its responsive pleading is due on July 5, 2011. Due to an upcoming trial and a pre-paid overseas vacation, counsel for DHM requires additional time to adequately prepare a response to Plaintiffs' First Amended Complaint. Counsel for DHM has requested a 10-day extension of time in which to file its responsive pleading, to which counsel for Plaintiffs has graciously agreed. Accordingly, Plaintiffs and DHM, by and through their counsel, hereby stipulate that, subject to the Court's approval, Defendant DOCTORS HOSPITAL

1 OF MANTECA shall have a 10-day extension, up to and including July 15, 2011, to file a response
2 to Plaintiffs' First Amended Complaint.

3 Respectfully submitted,

4 DATED: July 1, 2011

DUMMIT, BUCHHOLZ & TRAPP

5 By: /s/ *Randall R. McKinnon*

6 Daniela P. Stoutenburg
7 Randall R. McKinnon
8 Attorneys for Defendant, DOCTORS HOSPITAL OF
MANTECA

9 DATED:

U.C. DAVIS CIVIL RIGHTS CLINIC

10 By: /s/ *Carter C. White*

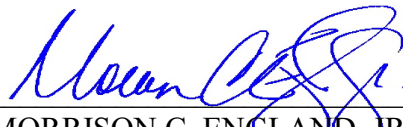
11 Carter C. White
12 Attorneys for Plaintiffs, LINNIE STAGGS, as
13 Administrator of the ESTATE OF ROBERT E.
14 STAGGS, deceased, and MELISSA STAGGS

15 **ORDER**

16 Based on the parties' stipulation and good cause appearing, Defendant DOCTORS
17 HOSPITAL OF MANTECA shall file its response to the first amended complaint on or before
18 July 15, 2011.

19 IT IS SO ORDERED.

20 Dated: July 8, 2011

21 
22 MORRISON C. ENGLAND, JR.
23 UNITED STATES DISTRICT JUDGE
24
25
26
27
28