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Attorneys for Defendants THE PERMANENTE MEDICAL GROUP, INC., RONALD CARRETTI, TRACY NUNES, SHIRLEY HANSON

16 IN THE UNITED STATES DISTRICT COURT  
 17 FOR THE EASTERN DISTRICT OF CALIFORNIA  
 18 SACRAMENTO DIVISION

19 ELSA ROBERTS,

20 Plaintiff,

21 vs.

22 THE PERMANENTE MEDICAL GROUP,  
 23 INC. aka TPMG, INC., a California  
 24 Corporation, RONALD CARRETTI,  
 25 TRACY NUNES, SHIRLEY HANSON ,

26 Defendants.

Case No.: 2:12-cv-02506-CKD

**STIPULATION AND [PROPOSED]  
 ORDER TO REVISE SCHEDULING  
 ORDER ENTERED FEBRUARY 24, 2014**

*Hon. Judge Carolyn Delaney*

27 On February 24, 2014, Magistrate Judge Delaney entered an Order rescheduling  
 28 the above-captioned matter. Due to unavoidable delays resulting from personal family  
 matters involving a member of plaintiff's trial team, the parties now believe that they  
 cannot complete the tasks necessary to have this matter ready for trial on the scheduled

1 date of February 23, 2015, and respectfully stipulate to and request that the matter be  
2 rescheduled as follows:

<u>Activity</u>	<u>Present Date</u>	<u>Proposed Date</u>
4 Percipient Discovery Cut-off	08/27/2014	10/29/2014
5 Expert Witness Reports	08/25/2014	10/29/2014
6 Expert Discovery Cut-Off	09/24/2014	11/26/2014
7 Last Day to Hear Dispositive Motions	10/22/2014	1/14/2015
8 Pretrial Conference Reports Due	01/14/2015	03/18/3015
9 Pretrial Conference	01/28/2015	03/25/2015
10 Jury Trial (10 days)	02/23/2015	04/27/2015

12 The parties hereby stipulate that the foregoing proposed dates are convenient to  
13 all parties for the completion of this action.

14  
15 DATED: August 25, 2014

**MCCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH, LLP**

s/ Matthew K. Hawkins

By \_\_\_\_\_

MATTHEW K. HAWKINS  
Attorneys for Defendants

THE PERMANENT MEDICAL GROUP,  
INC., RONALD CARETTI, TRACY  
NUNES, SHIRLEY HANSON

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21 DATED: August 25, 2014

**NAGELEY, MEREDITH & MILLER, INC.**

s/ Andrea M. Miller

By: \_\_\_\_\_

ANDREA M. MILLER  
Attorney for Plaintiff ELSA ROBERTS

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**ORDER**

The Court, having read the foregoing Stipulation between the parties, hereby Orders that, pursuant to that Stipulation the dates for the completion of this litigation shall be those reflected as modified above to accommodate the court's calendar.

**IT IS SO ORDERED.**

Dated: August 27, 2014

  
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CAROLYN K. DELANEY  
UNITED STATES MAGISTRATE JUDGE