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11 MEDICAL GROUP, INC., RONALD CARETTI,
TRACY NUNES and SHIRLEY HANSON
12

13 UNITED STATES DISTRICT COURT

14 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION
15

16 ELSA ROBERTS,

17 Plaintiff,

18 v.

19 THE PERMANENTE MEDICAL GROUP,
INC. aka TPMG, INC., a California
20 Corporation, RONALD CARRETTI, TRACY
NUNES, SHIRLEY HANSON and DOES 1
21 through 20,

22 Defendants.

Case No. 2:12-CV-02506 CKD

**STIPULATION AND ORDER
MODIFYING THE SCHEDULING
ORDER**

Hon. Judge Carolyn Delaney

23 WHEREAS:

24 1. Defendants THE PERMANENTE MEDICAL GROUP, INC., RONALD CARETTI,
25 TRACY NUNES, and SHIRLEY HANSON intend to file a Motion for Summary Judgment in this
26 matter.

27 2. Pursuant to the current scheduling order, the last day to hear dispositive motions is
28 January 14, 2015.

1 3. Under this date, Defendants would be required to file and serve their Motion for
2 Summary Judgment no later than December 14, 2014. Plaintiff would be required to oppose the
3 Motion no later than December 31, 2014.

4 4. The parties have previously stipulated to extend the deadline for discovery cut-off to
5 allow Plaintiff to depose Plaintiff's treating physician, Dr. Hellman, who was not available within the
6 existing schedule. Dr. Hellman's deposition is currently scheduled for January 8, 2015.

7 5. To allow Plaintiff the opportunity to depose Dr. Hellman prior to opposing Defendants'
8 Motion for Summary Judgment, the parties stipulate and request that the court extend the deadline for
9 hearing dispositive motions to February 4, 2015.

10 6. In addition, the parties previously stipulated to extend the date for Expert Designation
11 and Witness reports from October 29, 2014 to December 31, 2014. The parties further stipulate that
12 the parties shall be permitted to designate additional experts and reports, if the evidence is intended
13 solely to contradict or rebut evidence on a previously designated expert, pursuant to F.R.C.P. Rule
14 26(f) or no later than January 31, 2015.

15 **SO STIPULATED:**

16 Dated: December 2, 2014

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

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18
19 By: /s/ Laura N. Erickson
 Matthew K. Hawkins
 Laura N. Erickson
20 Attorneys for Defendants THE PERMANENTE
21 MEDICAL GROUP, INC., RONALD CARETTI,
22 TRACY NUNES and SHIRLEY HANSON

23 Dated: December 2, 2014

NAGELEY, MEREDITH & MILLER, INC.

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25 By: /s/ Andrea M. Miller
 Andrea M. Miller
26 Attorneys for Plaintiff ELSA ROBERTS
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BASED ON THE FOREGOING, AND GOOD CAUSE APPEARING:

1. The last day to hear dispositive motions will be February 4, 2015.
2. The parties will be permitted to supplementally designate experts pursuant to F.R.C.P. Rule 26(f), or no later than January 31, 2015.

IT IS SO ORDERED:

Dated: December 4, 2014



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE