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Attorney for Sarah R. Novo, Plaintiff

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 8 IN THE UNITED STATES DISTRICT COURT
 9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 SARAH R. NOVO,) Case No.: 2:13-CV-00521-MCE-AC
 11 Plaintiff,)

12 v.)

13 CITY OF SACRAMENTO, ANGELIQUE) **STIPULATION AND ORDER TO**
 14 ASHBY,) **EXTEND DUE DATE FOR FILING THE**
 15 Defendants.) **JOINT STATEMENT OF DISPUTED AND**
 16) **UNDISPUTED FACTS AND PLAINTIFF'S**
 17) **EXHIBIT LIST**
 18)

19 The parties, Plaintiff Sarah R. Novo ("Plaintiff") and Defendants City of
 20 Sacramento and Angelique Ashby ("Defendants"), through their respective attorneys
 21 of record, hereby move the court for a 14 day extension to file the Joint Statement of
 22 Disputed and Undisputed Facts and Plaintiff's Exhibit List. Currently, the deadline
 23 set by the Court is September 1, 2016.

24 The reason for this request is that Plaintiff's counsel's health has deteriorated
 25 significantly this past weekend. Counsel Robert F. Koehler Jr. suffers from Wegner's

1 Disease and has recently relapsed. If left untreated, Mr. Koehler may suffer
2 permanent kidney damage. His doctors have advised him to have a Rituxan
3 (rituximab) infusion as early as possible based on his recent lab reports. The
4 infusion has been moved up to August 31, 2016. Given this unexpected health
5 crisis, plaintiff is unable to complete her Joint Statement of Disputed and
6 Undisputed Facts or her Exhibit List by September 1, 2016. (Please see attached
7 letter from Dr. David Lehman dated August 30, 2016.) Without plaintiff's input, the
8 parties cannot file a Joint Statement of Disputed and Undisputed Issues by the court
9 ordered deadline of September 1, 2016.

10 Therefore, the parties respectfully request that the Court extend the current
11 deadline to September 15, 2016.

12 SO STIPULATED. DATED: August 31, 2016

Respectfully submitted,

14 HIBBITT TARBEL & KOEHLER

16 BY: /s/ ROBERT F. KOEHLER

17 **ROBERT F. KOEHLER**
Attorney for Plaintiff

19 DATED: August 31, 2016

KATHLEEN T. ROGAN
City Attorney

21 BY: /s/ KATHLEEN T. ROGAN


22 **KATHLEEN T. ROGAN**
Senior Deputy City Attorney
Attorneys for Defendants

1 **ORDER**

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3 In accordance with the foregoing stipulation, and good cause appearing, the
4 deadline for filing the Joint Statement of Disputed and Undisputed Facts and
5 Plaintiff's Exhibit Lis is hereby extended from September 1, 2016 to September 15,
6 2016.

7 IT IS SO ORDERED.

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9 Dated: September 1, 2016

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12 MORRISON C. ENGLAND, JR.
13 UNITED STATES DISTRICT JUDGE
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