1	ROBERT H. ZIMMERMAN, Bar No. 84345		
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3	Sacramento, Čalifornia 95825-6502 (916) 567-0400		
4	FAX: 568-0400		
5	Attorneys for Defendant THE FREMONT-RIDEOUT HEALTH GROUP		
6	IN THE UNITED STATES DISTRICT COURT		
7	EASTERN DISTRICT OF CALIFORNIA		
8			
9	CHUKWUEMEKA NDULUE, M.D.,) No. 2:14-cv-00735-GEB-EFB)		
10	Plaintiff,)) STIPULATION AND ORDER TO		
11	vs.) CONTINUE DISCOVERY DEADLINES		
12	THE FREMONT-RIDEOUT HEALTH GROUP,) et al.,		
13	Defendants.		
14			
15	The parties, by and through their undersigned counsel, stipulate and agree the current		
16	discovery plan and Scheduling Order may and should be extended. Good cause exists for the		
17	requested relief in order to schedule and conduct several depositions. This is the first such request.		
18	This stipulation, if approved, would result in the following new deadlines in this case:		
19	1. Last day to complete discovery from July 6, 2015 to August 24, 2015.		
20	2. Disclosure of experts from January 5, 2015 to July 13, 2015.		
21	3. Last day for the Court to hear dispositive motions from September 14, 2015 to		
22	October 19, 2015.		
23	4. The Final Pretrial Conference is rescheduled for December 14, 2015 at 11:00 a.m.		
24	5. The trial date of February 9, 2016 shall remain the same.		
25			
26	///		
27	DATED this 8 th day of January, 2015.		
28			
	STIPULATION AND ORDER TO CONTINUE DISCOVERY DEADLINES -1-		

1	LAW OFFICE OF STEPHEN T. HODGE	LAW OFFICES OF CLIFFORD CHIGBU
2	_/S/: Stephen T. Hodge	
3	STEPHEN T. HODGE CSB No. 158273	<u>/S/: Clifford Chigbu</u> CLIFFORD CHIGBU
4	Counsel for Plaintiff	CSB No. 221386 Counsel for Plaintiff
5		Counsel for Flamen
6		
7	SCHUERING ZIMMERMAN & DOYLE, LLP	
8		
9	/S/: Robert H. Zimmerman ROBERT H. ZIMMERMAN	
10	CSB No. 84345 Counsel for Defendant	
11	The Fremont-Rideout Health Group	
12		
13		
14		ORDER
15	IT IS SO ORDERED.	
16	Dated: January 12, 2015	
17	Buttod: junuary 12, 2019	$A_{1}=D_{1}$
18	- //	July E. Krinelf
19	GA Se	RLAND E. BURRELL, JR. nior United States District
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