

1 MCGREGOR W. SCOTT
United States Attorney
2 GREGORY T. BRODERICK
Assistant United States Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
Facsimile: (916) 554-2900

5 Attorneys for Secretary Azar
6
7

8 **IN THE UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**
10

11 PRIME HEALTHCARE SERVICES –
SHASTA, LLC,

12 Plaintiff,

13 v.

14 ALEX AZAR, in his official capacity as the
Secretary of the Department of Health and
Human Services,

15 Defendant.
16
17
18

Case No.: 2:14-cv-02791-TLN-KJN

Consolidated with cases:

2:15-cv-00154-TLN-KJN;
2:15-cv-00324-TLN-KJN;
2:15-cv-00400-TLN-KJN;
2:15-cv-00450-TLN-KJN;
2:15-cv-00473-TLN-KJN;
2:15-cv-00474-TLN-KJN;
2:15-cv-00709-TLN-KJN;
2:15-cv-01120-TLN-KJN;
2:16-cv-00230-TLN-KJN;
2:16-cv-02278-TLN-KJN; and
2:16-cv-02521-TLN-KJN

19 **STIPULATION AND ORDER TO**
20 **EXTEND TIME FOR FEDERAL**
21 **DEFENDANTS TO RESPOND TO**
22 **PLAINTIFF'S SECOND AMENDED**
23 **COMPLAINT**

24 TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD HEREIN:

25 Pursuant to Local Rule 144, Defendant Secretary Alex Azar, sued in his official capacity as
26 the Secretary of the Department of Health and Human Services, and Plaintiff Prime Healthcare
27 Services Shasta, LLC, by and through their respective counsel of record, stipulate and agree to an
28 extension of time of 28 days in which defendant may respond to the Second Amended Complaint, up
to and including May 2, 2018. The Court recently consolidated a dozen cases into this single matter,

1 and permitted the filing of a Second Amended Complaint. The parties previously stipulated to
2 extend the initial due date to April 4, 2018. On March 19, 2018, counsel for the Federal Defendants
3 suffered an unexpected injury and has been unable to work any more than sporadically since that
4 date. Due to this unforeseen circumstance, the parties agree that the defense will reasonably require
5 additional time to respond. If given additional time, such response will be more useful to the Court
6 and the Plaintiff, thus conserving this District's already overburdened and limited resources.
7 Therefore, the parties stipulate, and propose, a further extension of 28 days for the defendant to file
8 its responsive pleading, up to and including May 2, 2018.

9 RESPECTFULLY SUBMITTED,

10 DATED: March 27, 2018

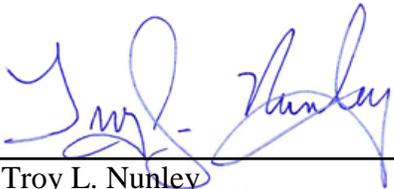
11 By: /s/ Ian Byrnside (authorized 03/27/2018)
12 SHAREEF FARAG
13 S. DEREK BAUER
14 IAN BYRNSIDE
15 Attorneys for Plaintiff

16 McGREGOR W. SCOTT
17 United States Attorney

18 By: /s/ Gregory T. Broderick
19 GREGORY T. BRODERICK
20 Assistant United States Attorney
21
22
23
24
25
26
27
28

1 Good cause appearing, **IT IS SO ORDERED.**

2 Dated: April 9, 2018

3
4
5 
6

Troy L. Nunley
United States District Judge

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28