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11 Attorneys for Plaintiff

12 LODI MEMORIAL HOSPITAL ASSOCIATION, a California non-
 13 profit public benefit corporation

14 UNITED STATES DISTRICT COURT
 15 FOR THE EASTERN DISTRICT OF CALIFORNIA
 16 SACRAMENTO DIVISION

17 LODI MEMORIAL HOSPITAL
 18 ASSOCIATION, a California non-profit
 19 public benefit corporation,

20 Plaintiff,

21 vs.

22 TIGER LINES, LLC, a California
 23 limited liability company; GROUP &
 24 PENSION ADMINISTRATORS, INC.,
 25 a Texas corporation; and DOES 1
 26 THROUGH 25, INCLUSIVE,

27 Defendants.

Case No.: 2:15-cv-00319-MCE-KJN

1. **STIPULATION TO CONTINUE JOINT STATUS REPORT AND RULE 26F DISCOVERY PLAN DEADLINES PENDING THE COURT'S RULING ON DEFENDANT'S MOTION TO DISMISS AND PLAINTIFF'S MOTION FOR REMAND; AND**
2. **ORDER.**

28 TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:

WHEREAS, the complaint in this lawsuit was filed on December 22,
 2014 in the San Joaquin County Superior Court and removed to the United States

1 District Court, Eastern District of California on February 6, 2015;

2
3 WHEREAS Defendants Tiger Lines, LLC and Group & Pension
4 Administrators, Inc. filed a Motion To Dismiss on February 13, 2015, in response
5 to which Plaintiff filed an Opposition and concurrent Motion for Remand, with the
6 Motion scheduled to be heard on April 2, 2015;

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8 WHEREAS on March 20, 2015 the Court issued a Minute Order
9 deeming the Motion to Dismiss submitted without appearance and without
10 argument pursuant to Local Rule 230(g);

11
12 WHEREAS according to the Order Requiring Joint Status Report
13 issued by the Court, the parties must confer and prepare and submit a Joint Status
14 Report, including a Rule 26(f) discovery plan, within 60 days of the date of
15 removal—*i.e.*, by April 7, 2015;

16
17 WHEREAS the Court has not yet issued a ruling on Defendant's
18 Motion To Dismiss or Plaintiff's Motion for Remand;

19
20 WHEREAS the parties believe that an effective Rule 26(f) conference
21 and discovery plan must await the Court's ruling on the potentially dispositive
22 issues in this case. Until the Motions are decided, the parties are unaware of which
23 matters remain at issue and are therefore unable to sufficiently prepare a Joint
24 Status Report by the current deadline.

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26 The parties therefore stipulate and agree, and respectfully request that
27 the Court continue the dates for the parties to confer and submit a Joint Status
28 Report and Rule 26(f) Discovery Plan until 30 days after the Court rules on the

1 pending Defendant's Motion To Dismiss and Plaintiff's Motion for Remand.

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4 THE FOREGOING IS SO STIPULATED

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6 Dated: April 6, 2015

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9 STEPHENSON, ACQUISTO & COLMAN

10 /s/ Michael S. Robinson

11 _____
12 MICHAEL S. ROBINSON

13 Attorneys for
14 LODI MEMORIAL HOSPITAL
ASSOCIATION

15 Dated: April 6, 2015

16
17 LEWIS BRISBOIS BISGAARD
18 & SMITH LLP

19 /s/ Elise D. Klein

20 _____
21 ELISE D. KLEIN

22 Attorneys for
23 TIGER LINES, LLC and GROUP &
24 PENSION ADMINISTRATORS, INC.

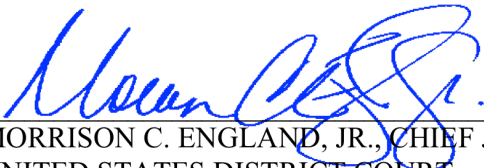
ORDER

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3 Good cause appearing therefore, the Court hereby orders that the
4 deadlines for the parties to confer and submit their Joint Status Report are hereby
5 continued pending the Court's ruling on Defendant's Motion To Dismiss and
6 Plaintiff's Motion for Remand.
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8 The Court will set new dates, if appropriate, for the parties to confer
9 and submit a Joint Status Report upon issuing its ruling on the pending motions.
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11 IT IS SO ORDERED.

12 Dated: April 9, 2015
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MORRISON C. ENGLAND, JR., CHIEF JUDGE
UNITED STATES DISTRICT COURT
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