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10 Attorneys for Plaintiffs  
 11 Jack Howarth and Linda Gottfredson

12 UNITED STATES DISTRICT COURT  
 13 EASTERN DISTRICT OF CALIFORNIA  
 14 SACRAMENTO DIVISION  
 15

16 JACK HOWARTH, individually, and LINDA  
 17 GOTTFREDSON, individually,

18 Plaintiff(s),

19 v.

20 COTTONWOOD H.C., INC. dba  
 COTTONWOOD HEALTHCARE CENTER;  
 21 NORTH AMERICAN HEALTH CARE, INC.;  
 JOHN SORESENSEN; JAMES ELLIS-  
 22 SHERINIAN; KAREN NIVISION; RITA  
 HERNANDEZ; and DOES 1 through 50,  
 23 inclusive,

24 Defendant(s).

Case No. 2:15-CV-409- JAM-AC

**STIPULATION TO EXTEND  
 DEADLINE TO SUBMIT JOINT  
 STATUS REPORT FROM APRIL 21,  
 2015 TO JULY 6, 2015; ORDER**

Date: May 6, 2015  
 Time: 9:30 a.m.  
 Ctrm: 6, 14<sup>th</sup> Floor  
 Judge: Hon. John A. Mendez

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**RECITALS**

The Court’s Order Requiring Joint Status Report [Dkt. No. 7] (the “Order”) compels the Plaintiffs and the Defendants (together, the “Parties”) to submit a joint status report within 60 days of the February 20, 2015 removal of this action. As a result, the deadline for the Parties to submit a joint status report is April 21, 2015.

Plaintiffs filed a Motion to Remand (“Motion”) on March 23, 2015. Plaintiffs selected a hearing date of May 6, 2015, the earliest available hearing date on the Court’s calendar. Defendants oppose the Motion.

The Court’s ruling on the Motion may render the submission of a joint status report moot, because if the Court grants the Motion, no joint status report will be necessary.

In order to avoid unnecessary expense, the Parties wish to extend the deadline for submitting a joint status report from April 21, 2015 to and including July 6, 2015 (60 days after the May 6 hearing on the Motion). This is the first request for an extension of this deadline.

**STIPULATION**

The Parties hereby stipulate to an extension of the deadline for submitting a joint status report from April 21, 2015 to and including July 6, 2015.

Dated: April 6, 2015

JAY P. RENNEISEN  
Law Offices of Jay P. Renneisen

NORMAN C. HILE  
MARC A. LEVINSON  
Orrick, Herrington & Sutcliffe LLP

By:                     /s/ Norman C. Hile                      
NORMAN C. HILE  
Attorneys for Plaintiffs

Dated: April 6, 2015

KRIKOR J. MESHEFEJIAN  
Levene, Neale, Bender, Yoo & Brill L.L.P.

By:           /s/ Krikor J. Meshefejian                    (as authorized on 4/6/15)  
KRIKOR J. MESHEFEJIAN  
Attorneys for Defendants

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**GOOD CAUSE HAVING BEEN SHOWN**, the Court orders that the deadline for the Parties to submit a joint status report be extended from April 21, 2015, to and including July 6, 2015.

**IT IS SO ORDERED.**

Dated: April 6, 2015

/s/ John A. Mendez  
Hon. John A. Mendez  
United States District Court Judge