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10 11	Attorneys for Plaintiffs Judy Goldman and Judy Goldman, individually		
12		NETRICT COLUDT	
13	UNITED STATES DISTRICT COURT		
14	EASTERN DISTRICT OF CALIFORNIA		
15	SACRAMENT	O DIVISION	
16	EDWARD GOLDMAN, by and through his	Case No. 2:15-cv-00432- JAM-AC	
17	successor-in-interest, JUDY GOLDMAN, and JUDY GOLDMAN, individually,	STIPULATION TO EXTEND	
18	Plaintiff(s),	DEADLINE TO SUBMIT JOINT STATUS REPORT FROM APRIL 27,	
19	v.	2015 TO JULY 6, 2015; ORDER	
20	CARMICHAEL CARE AND REHABILITATION CENTER, SUN HEALTHCARE GROUP, INC., SUNBRIDGE HEALTHCARE CORP., REGENCY	Date: May 6, 2015 Time: 9:30 a.m.	
21		Ctrm: 6, 14 th Floor Judge: Hon. John A. Mendez	
22		0.0000 11011 00111 111 111011002	
- 1	HEALTHCARE CORP., REGENCY		
23	HEALTHCARE CORP., REGENCY HEALTH SERVICES, INC., CARMICHAEL CARE, INC. dba ROSEWOOD TERRACE		
23 24	HEALTHCARE CORP., REGENCY HEALTH SERVICES, INC., CARMICHAEL CARE, INC. dba ROSEWOOD TERRACE CARE AND REHABILITIATION, NORTH AMERICAN HEALTH CARE, INC., JOHN		
	HEALTHCARE CORP., REGENCY HEALTH SERVICES, INC., CARMICHAEL CARE, INC. dba ROSEWOOD TERRACE CARE AND REHABILITIATION, NORTH		
24	HEALTHCARE CORP., REGENCY HEALTH SERVICES, INC., CARMICHAEL CARE, INC. dba ROSEWOOD TERRACE CARE AND REHABILITIATION, NORTH AMERICAN HEALTH CARE, INC., JOHN SORENSEN, and DOES 1 through 50,		
24 25	HEALTHCARE CORP., REGENCY HEALTH SERVICES, INC., CARMICHAEL CARE, INC. dba ROSEWOOD TERRACE CARE AND REHABILITIATION, NORTH AMERICAN HEALTH CARE, INC., JOHN SORENSEN, and DOES 1 through 50, inclusive,		

1	<u>RECITALS</u>		
2	The Court's Order Requiring Joint Status Report [Dkt. No. 7] (the "Order") compels the		
3	Plaintiffs and the Defendants (together, the "Parties") to submit a joint status report within 60		
4	days of the February 24, 2015 removal of this action. As a result, the deadline for the Parties to		
5	submit a joint status report is April 27, 2015.		
6	Plaintiffs filed a Motion to Remand ("Motion") on March 23, 2015. Plaintiffs selected a		
7	hearing date of May 6, 2015, the earliest available hearing date on the Court's calendar.		
8	Defendants oppose the Motion.		
9	The Court's ruling on the Motion may render the submission of a joint status report moot		
10	because if the Court grants the Motion, no joint status report will be necessary.		
11	In order to avoid unnecessary expense, the Parties wish to extend the deadline for		
12	submitting a joint status report from April 27, 2015 to and including July 6, 2015 (60 days after		
13	the May 6 hearing on the Motion). This is the first request for an extension of this deadline.		
14	<u>STIPULATION</u>		
15	The Parties hereby stipulate to an extension of the deadline for submitting a joint status		
16	report from April 27, 2015 to and including July 6, 2015.		
17			
18	Dated: April 6, 2015 EDWARD P. DUDENSING Law Offices of Edward P. Dudensing		
19	NORMAN C. HILE		
20	MARC A. LEVINSON Orrick, Herrington & Sutcliffe LLP		
21	By: /s/ Norman C. Hile		
22	NORMAN C. HILE Attorneys for Plaintiffs		
23	7 Ktorneys for Flankins		
24	Dated: April 6, 2015 KRIKOR J. MESHEFEJIAN Levene, Neale, Bender, Yoo & Brill L.L.P.		
25			
26	By: <u>/s/ Krikor J. Meshefejian</u> (as authorized on 4/6/15 KRIKOR J. MESHEFEJIAN		
27	Attorneys for Defendants		

1	GOOD CAUSE HAVING BEEN SHOWN, the Court orders that the deadline for the	
2	Parties to submit a joint status report be extended from April 27, 2015, to and including July 6,	
3	2015.	
4	IT IS SO ORDERED.	
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6	Dated: April 6, 2015	/s/ John A. Mendez
7		Hon. John A. Mendez United States District Court Judge
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