Tugas v. Hill-Rom Company, Inc.

Doc. 10

	1	William Turley (SBN: 122408) bturley@turleylawfirm.com
	2	David Mara (SBN: 230498)
	3	dmara@turleylawfirm.com The Turley Law Firm, APLC 7428 Trade Street
	4	San Diego, CA 92121
	5	Telephone: (619) 234-2833 Facsimile: (619) 234-4048
	6	Attorneys for Plaintiff
	7	GERMÂN TUGAS
	8	Joan B. Tucker Fife (SBN: 144572) JFife@winston.com
	9	Emily C. Schuman (SBN: 271915)
	10	ESchuman@winston.com WINSTON & STRAWN LLP
2	11	101 California Street, Suite 3900 San Francisco, CA 94111
Winston & Strawn LLP 101 California Street San Francisco, CA 94111-5802	12	Telephone: (415) 591-1000 Facsimile: (415) 591-1400
	13	Attomove for Defendant
	14	Attorneys for Defendant HILL-ROM COMPANY, INC.
Winston & 101 Calif n Francisco,	15	
San	16	
	17	
	18	
	19	
	20	
	21	
	22	
	23	
	24	
	25	
	26	
	27	
	28	

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

THIS STIPULATION is hereby entered into by and between Plaintiff German Tugas and Defendant Hill-Rom Company, Inc. ("Hill-Rom") pursuant to Eastern District of California Local Rule 143(a)(1).

RECITALS

WHEREAS, the Court issued an Order on November 23, 2015 requiring the parties to meet and confer pursuant to Federal Rule of Civil Procedure 26(f) and to file a joint status report by January 19, 2016 (dkt. 2);

WHEREAS, Plaintiff filed his First Amended Complaint on December 21, 2015 (dkt. 6) that contained new allegations not previously set forth in the original Complaint (dkt. 1);

WHEREAS, Hill-Rom timely answered on January 7, 2016 (dkt. 7);

WHEREAS, the parties communicated on January 14, 2016 and agreed that a more comprehensive meet and confer pursuant to Rule 26(f) and a more tailored joint status report could be submitted if the parties had additional time to review the case as alleged in Plaintiff's First Amended Complaint;

WHEREAS, the parties do not seek this continuance for purposes of delay, but, rather, to efficiently and thoroughly manage the case in regards to timelines, substance, and procedure;

NOW, THEREFORE, the parties hereby stipulate to, and request that the Court order, that the parties' deadline to meet and confer pursuant to Federal Rule of Civil Procedure 26(f) and their deadline to file a joint status report shall be extended 30 days, to February 18, 2016.

IT IS SO STIPULATED.

22 ///

///

///

///

///

///

23

24

25

26

27

28 ///