	1	ALEXANDER L. NOWINSKI, #304967		
HARDY BRICH BRICH BRICH BRICH BRICH BRICH BRICH APrefessional Les Carpensition Ladélidad in 1967 455 Capitol Mall, Ste. 200 Sacramonto, CA 95814 phone (916) 449-3880 fax (916) 449-3888	2	HARDY ERICH BROWN & WILSON A Professional Law Corporation 455 Capitol Mall, Ste. 200 Sacramento, California 95814		
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	4	(916) 449-3800 • Fax (916) 449-3888		
	5	Attorney for Plaintiff Lafonzo R Turner		
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	8	UNITED STATES DISTRICT COURT		
	9	EASTERN DISTRICT OF CALIFORNIA		
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	11	LAFONZO R. TURNER,	No. 2:16-cv-0969 MCE AC P	
	12	Plaintiff,	STIPULATION AND	
	13	v.	[PROPOSED] ORDER TO EXTEND TIME AND CONTINUE	
	14	N. RIAZ, M.D.; V. M. DUC, M.D.;	HEARING ON DEFENDANTS' MOTION FOR SUMMARY	
	15	& NGUYEN, PSY.	JUDGMENT	
	16	Defendants.	Hon. Allison Claire Hearing Date: June 26, 2019 Complaint Filed: May 6, 2016	
	17		Complaint Flied: May 6, 2016	
	18	The parties to this action stipulate, through their undersigned counsel, to		
	19	continue the June 26, 2019 hearing date on Defendants' Motion for Summary Judgment		
	20	to August 21, 2019, at 10:00 a.m. in Courtroom 26.		
	21	Plaintiff's response to Defendants' Motion for Summary Judgment requires		
	22	review of voluminous medical records and identification and retention of an		
	23	appropriate medical expert. This process is ongoing but will not be completed in		
	24	sufficient time to comply with current deadlines.		
	25	The briefing schedule shall operate from the continued hearing date pursuant to		
	26	Local Rule 230 subd. (b) - (d). Plaintiff's Opposition is due August 7, 2019. Defendants'		
	27	Reply is due August 14, 2019.		
	28	1 STIPULATION AND [PROPOSED] ORDER TO		
			XTEND TIME AND CONTINUE HEARING ON	

HARDY ERICH BROWN VISION A Preinstand Las Carporation Established in 1967 455 Capitol Mall, Ste. 200 Sacramento, CA 95814 phone (916) 449-3880 fax (916) 449-3880	1	Date: May 31, 2019	/s/ Alexander L. Nowinski	
	2		ALEXANDER L. NOWINSKI	
	3		Hardy Erich Brown & Wilson A Professional Law Corporation Attorney for Plaintiff Lafonzo R. Turner	
	4		Attorney for Plaintiff Lafonzo K. Turner	
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	6	Date: May 31, 2019	/s/ Sarah M. Brattin	
	7		SARAH M. BRATTIN Doputy Attornoy Congral	
	8		Deputy Attorney General Attorney for Defendants Nguyen, Riaz, and Duc	
	9	<b>IT IS SO ORDERED.</b> Date: June 3, 2019	HON. ALLISON CLAIRE UNITED STATES MAGISTRATE JUDGE	
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			2 STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME AND CONTINUE HEARING ON DEFENDANTS' MOTION FOR SUMMARY JUDGMENT	