



1 The parties, Plaintiff SAN JOAQUIN GENERAL HOSPITAL and  
2 Defendants, CIGNA HEALTHCARE OF CALIFORNIA, INC. and CIGNA  
3 HEALTH & LIFE INSURANCE COMPANY, (“CIGNA”), through their  
4 respective attorneys of record, hereby jointly stipulate to a 120-day extension of  
5 the currently scheduled discovery deadlines as set forth below. Pursuant to Rule  
6 16, a party may seek modification of a scheduling order, including modification of  
7 a discovery cut-off date.

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9 WHEREAS, on July 6, 2016, Plaintiff filed the action in state court;

10 WHEREAS, on August 12, 2016, CIGNA removed the action to this Court;

11 WHEREAS , on August 15, 2016, the Court issued The Initial Pre-Trial  
12 Scheduling Order setting the current deadline to complete all non-expert discovery  
13 365 days from the filing of the original complaint in the action, i.e., July 6, 2017;

14 WHEREAS, on June 20, 2017, the Court approved the Protective Order to  
15 allowing the parties to discovery relating to information that may contact trade  
16 secrets, confidential commercial, personal or financial information, and/or  
17 protected health information;

18 WHEREAS, due to the number of patient claims at issue, the parties are  
19 unable to complete the discovery process prior to the July 6, 2017 deadline;

20 WHEREAS, trial date has not been set;

21 WHEREAS, the parties believe the extension of discovery cut-off will not  
22 affect any other deadline established by the Court;

23 WHEREAS, the parties have not made any previous request to extend any  
24 discovery deadlines in this action;

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26 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by  
27 the parties through their undersigned counsel of record that:  
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1. The non-expert discovery cut-off deadline is extended 120 days to November 3, 2017.

IT IS SO STIPULATED.

Dated: July 3, 2017

LAW OFFICES OF STEPHENSON,  
ACQUISTO & COLMAN, INC.

By: /s/ Barbara V. Lam

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BARBARA V. LAM  
Attorneys for Plaintiff  
SAN JOAQUIN GENERAL HOSPITAL

Dated: July 3, 2017

COLE PEDROZA LLP

By: /s/ Tammy C. Weaver

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TAMMY C. WEAVER  
Attorneys for Defendant  
CIGNA HEALTHCARE OF  
CALIFORNIA, INC. and CIGNA  
HEALTH & LIFE INSURANCE  
COMPANY

Filing Attestation: I, Barbara V. Lam, hereby attest that I have received authorization for the electronic signature(s) indicated by a “conformed” signature (/s/) within this e-filed document.

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**ORDER**

GOOD CAUSE APPEARING, the Court does find good cause to extend non-expert discovery cut-off 120 days, to November 3, 2017.

IT IS SO ORDERED.

Dated: July 11, 2017

  
MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE