

1 Troy A. Schell, Esq. (SBN 208661)
 Bryan Wong, Esq. (SBN 205573)
 2 3300 East Guasti Road, 3rd Floor
 Ontario, California 91761
 3 Telephone: (909) 235-4400
 Facsimile: (909) 235-4419
 4
 Attorneys for Plaintiff
 5 Prime Healthcare Services – Shasta, LLC,
 d.b.a Shasta Regional Medical Center
 6

7 PHILLIP A. TALBERT
 United States Attorney
 8 PHILIP A. SCARBOROUGH
 JOSEPH B. FRUEH
 9 Assistant United States Attorneys
 501 I Street, Suite 10-100
 10 Sacramento, CA 95814
 E-mail: philip.scarborough@usdoj.gov
 11 joseph.frueh@usdoj.gov
 Telephone: (916) 554-2700
 12 Facsimile: (916) 554-2900

13 Attorneys for Defendant
 THOMAS E. PRICE, M.D.
 14 Secretary, Department of Health & Human Services

15
 16 IN THE UNITED STATES DISTRICT COURT
 17 EASTERN DISTRICT OF CALIFORNIA
 18

19 PRIME HEALTHCARE SERVICES –
 SHASTA LLC, a Delaware limited liability
 20 company doing business as Shasta Regional
 Medical Center,

21 Plaintiff,

22 v.

23 THOMAS E. PRICE, M.D., in his official
 24 capacity as Secretary of the Department of
 Health and Human Services,

25 Defendant.
 26

Case No. 2:17-CV-00431-TLN-KJN

**STIPULATION AND ORDER TO CONTINUE
 DEFENDANT’S RESPONSE TO THE
 COMPLAINT**

1 **STIPULATION AND PROPOSED ORDER TO CONTINUE RESPONSE TO COMPLAINT**

2 IT IS HEREBY STIPULATED, by and between Plaintiff Prime Healthcare Services – Shasta,
3 LLC, and Defendant Thomas E. Price, M.D., through their undersigned counsel and subject to Court
4 approval, that the deadline for Defendant’s response to the Complaint be continued until after the Court
5 issues a decision on Defendant’s Motion for Stay of Proceedings (ECF No. 10), which is scheduled to be
6 heard on July 27, 2017.

7 Specifically, the parties stipulate that, subject to Court approval, Defendant shall file his response
8 to the Complaint within 30 days of the date of an order denying Defendant’s Motion, or within 30 days
9 of the date of an order lifting the requested stay of proceedings, whichever is applicable. The Court
10 approved this same stipulation in related actions numbered 2:17-cv-00069-TLN-KJN (ECF No. 11);
11 2:17-cv-00071-TLN-KJN (ECF No. 12); 2:17-cv-00072-TLN-KJN (ECF No. 9); 2:17-cv-00073-TLN-
12 KJN (ECF No. 10); 2:17-cv-00074-TLN-KJN (ECF No. 10); and 2:17-cv-00082-TLN-KJN (ECF
13 No. 10).

14 Dated: June 20, 2017

PHILLIP A. TALBERT
United States Attorney

15
16 By: /s/ Joseph B. Frueh
JOSEPH B. FRUEH
PHILIP A. SCARBOROUGH
Assistant United States Attorneys

17
18 Attorneys for Defendant
THOMAS E. PRICE, M.D.
Secretary, Department of Health & Human Services

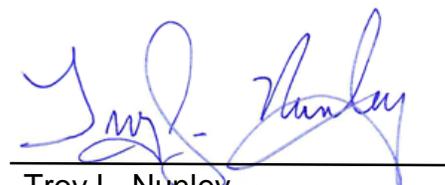
19
20 **TROY A. SCHELL, ESQ.**
BRYAN WONG, ESQ.

21
22 By: /s/ Bryan Wong (authorized on 6/20/2017)
Bryan Wong, Esq.

23
24 Attorneys for Plaintiff
Prime Healthcare Services – Shasta, LLC

25
26 **IT IS SO ORDERED.**

27 Dated: July 5, 2017

28 
Troy L. Nunley
United States District Judge