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17 Attorneys for Plaintiffs  
 18 LISA TAYLOR, MICHELLE PEREZ,  
 MARIA MARINTEZ, and BARBARA NIEMINEN

19 UNITED STATES DISTRICT COURT  
 20 EASTERN DISTRICT OF CALIFORNIA

22 MICHELLE PEREZ, LISA TAYLOR, MARIA  
 MARTINEZ, and BARBARA NIEMINEN, on  
 23 behalf of themselves and all others similarly  
 situated,

24 Plaintiff,

25 vs.

26 EASTERN PLUMAS HEALTH CARE  
 27 DISTRICT,

28 Defendant.

Case No. 2:17-cv-00674-JAM-EFB

**SECOND STIPULATION TO EXTEND  
 TIME TO RESPOND TO THE  
 SUMMONS AND FIRST AMENDED  
 COMPLAINT & ORDER**

1 **STIPULATION**

2 Plaintiffs LISA TAYLOR, MICHELLE PEREZ, MARIA MARINTEZ, and BARBARA  
3 NIEMINEN (collectively, "Plaintiffs"), and EASTERN PLUMAS HEALTH CARE DISTRICT  
4 ("Defendant") (collectively "Parties") hereby agree as follows:

5 Plaintiffs served the Summons and First Amended Complaint ("FAC") on Defendant via  
6 mail on May 16, 2017. Defendant was not a named party to the original Complaint filed in  
7 this matter. Defendant did not receive the Summons and FAC until May 18, 2017.

8 On June 2, 2017, pursuant to Eastern District Local Rule 144(a), the Parties filed a  
9 stipulation to extend Defendant's time to respond to the FAC until June 15, 2017.

10 On or around June 5, 2017, counsel for Plaintiffs and Defendant telephonically conferred  
11 regarding over Defendant's planned Motion to Dismiss the FAC.

12 At that time, Plaintiffs indicated that they would file a Second Amended Complaint (the  
13 "SAC"). The Parties agree that the filing and resolution of a Motion to Dismiss on the FAC  
14 would be a misuse of judicial resources.

15 In order to avoid a hearing on a Motion to Dismiss on the FAC, the Parties hereby stipulate  
16 to continue Defendant's deadline to respond to the FAC until June 30, 2017 to respond to  
17 the FAC.

18 Plaintiffs hereby agree to file the SAC on or before June 30, 2017.

19 Other than the express terms in this Stipulation, the Parties agree that this Stipulation shall  
20 not affect the rights or defenses of any party to this Stipulation, including Defendant's right  
21 to seek remand, dismissal, or any other procedural or substantive relief, on any grounds, in  
22 response to the filing of the SAC.

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1 IT IS SO STIPULATED.

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3 Pursuant to Civil Local Rule 131(e), concurrence in the filing of this document has been  
4 obtained from Ryan Hicks, Counsel for LISA TAYLOR, MICHELLE PEREZ, MARIA  
5 MARINTEZ, and BARBARA NIEMINEN on June 12, 2017.

6  
7 HOYER & HICKS

8  
9 Date: June 12, 2017

10 /s/ Ryan Hicks  
11 Ryan Hicks  
12 Attorney for Plaintiffs LISA TAYLOR,  
13 MICHELLE PEREZ, MARIA MARINTEZ,  
14 and BARBARA NIEMINEN

15  
16 SUTTON HAGUE LAW CORPORATION,  
17 P.C.

18  
19 Date: June 12, 2017

20 /s/ Joseph Vidal Macias  
21 Joseph Vidal Macias  
22 Attorney for Eastern Plumas Health Care  
23 District  
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**ORDER**

Based upon the foregoing stipulation and good cause appearing, the terms and conditions set forth in the stipulation are SO ORDERED.

Dated: 6/12/2017

/s/ John A. Mendez  
John A. Mendez  
United States District Court Judge

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