

1 Malcolm Segal (SBN 075481)  
2 Emily E. Doring (SBN 208727)

3 **SEGAL & ASSOCIATES, PC**

4 500 Capitol Mall, Suite 600  
5 Sacramento, CA 95814

6 Telephone: (916) 441-0886

7 [msegal@segal-pc.com](mailto:msegal@segal-pc.com)

8 [edoringer@segal-pc.com](mailto:edoringer@segal-pc.com)

9 Attorneys for Defendants

10 THEODORE WORKMAN, JR, and

11 SOLONIUK PAIN CLINIC, a Medical Corporation

12 Nick Jurkowitz (SBN 261283)

13 Elaine Sun (SBN 333985)

14 Fenton Law Group

15 1990 S Bundy, Suite 777

16 Los Angeles, CA 90025

17 Phone: (310) 444-5244

18 [njurkowitz@fentonlawgroup.com](mailto:njurkowitz@fentonlawgroup.com)

19 [esun@fentonlawgroup.com](mailto:esun@fentonlawgroup.com)

20 Attorneys for Defendant

21 LEONARD SOLONIUK

22 Steven Tennyson (SBN 310429)

23 **UNITED STATES ATTORNEY'S OFFICE**

24 Eastern District of California

25 501 I Street, Suite 10-100

26 Sacramento, CA 95814

27 Phone: (916) 554-2700

28 [Steven.Tennyson2@usdoj.gov](mailto:Steven.Tennyson2@usdoj.gov)

Attorneys for Plaintiff

UNITED STATES OF AMERICA

*(Additional Attorneys in Signature Page)*

1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF CALIFORNIA

3  
4 UNITED STATES OF AMERICA, *ex rel.*  
EDWARD POLLARD,

5 Plaintiff,

6 v.

7 THEODORE WORKMAN, JR;  
8 LEONARD SOLONIUK; and  
9 SOLONIUK PAIN CLINIC, a Medical  
Corporation,

10 Defendants.  
11  
12

Case No: 2:19-cv-0325 MCE DB

**STIPULATION TO EXTEND TIME FOR  
DEFENDANTS TO RESPOND TO  
COMPLAINT IN INTERVENTION;  
ORDER**

13  
14 IT IS HEREBY STIPULATED by and between the parties hereto through  
15 their respective counsel that Defendants THEODORE WORKMAN, JR,  
16 LEONARD SOLONIUK and SOLONIUK PAIN CLINIC, a Medical Corporation,  
17 may have additional time for filing of an answer or otherwise respond to the  
18 Complaint in Intervention. The Complaint in Intervention was filed on December 1,  
19 2023. A Summons issued December 6, 2023, with notice sent to the defendants  
20 the following day. Defendants filed waivers of service and the last day for  
21 defendants to answer or otherwise respond to plaintiff's complaint is February 5,  
22 2024. The parties stipulate pursuant to Rule 6 of the Federal Rules of Civil  
23 Procedure and Local Rule 144 that Defendants shall have until March 4, 2024, to  
24 answer or otherwise respond to the Complaint in Intervention.

25 Good cause exists for this extension due to professional and travel  
26 commitments of defense counsel and defendants, as well as additional defense  
27 counsel's assignment to the matter, requiring additional time to prepare an initial  
28 pleading.

1 This document is being electronically filed through the Court's ECF System.  
2 In this regard, counsel for Defendants hereby attests that (1) the content of this  
3 document is acceptable to all persons required to sign the document; (2)  
4 Plaintiff's counsel has concurred with the filing of this document; and (3) a record  
5 supporting this concurrence is available for inspection or production if so ordered.

6 Dated: January 30, 2024. **SEGAL & ASSOCIATES, PC**

7  
8 /s/ Emily E. Doring  
9 Malcolm Segal  
10 Emily E. Doring  
11 Attorneys for Defendants  
12 THEODORE WORKMAN, JR, and  
13 SOLONIUK PAIN CLINIC, a Medical Corporation

14 Dated: January 30, 2024. **FENTON LAW GROUP**

15 /s/ Nick Jurkowitz  
16 Nick Jurkowitz  
17 Elaine Sun  
18 Attorneys for Defendant  
19 LEONARD SOLONIUK

20 Dated: January 30, 2024. **UNITED STATES ATTORNEY'S OFFICE**

21 /s/ Steven Tennyson  
22 Steven Tennyson  
23 Attorneys for Plaintiff  
24 UNITED STATES OF AMERICA

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1 Dated: January 30, 2024.

**HIRST LAW GROUP**

2

3

/s/ Michael A. Hirst

4

Michael A. Hirst (SBN 131034)

Marisela Bernal (SBN 329589)

5

**HIRST LAW GROUP**

200 B Street, Suite A

6

Davis, CA 95616

Phone: (530) 756-7700

7

[michael.hirst@hirstlawgroup.com](mailto:michael.hirst@hirstlawgroup.com)

8

[Marisela.bernal@hirstlawgroup.com](mailto:Marisela.bernal@hirstlawgroup.com)

9

Attorneys for Plaintiff

EDWARD POLLARD

10 Dated: January 30, 2024.

**JS ABRAMS LAW, PC**

11

12

/s/ Navid Kanani

13

Navid Kanani (SBN 270797)

JS ABRAMS LAW, PC

14

20501 Ventura Blvd., Suite 165

Woodland Hills, CA 91364

15

Phone: (818) 330-4515

16

[navid@jsafirm.com](mailto:navid@jsafirm.com)

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Attorneys for Plaintiff

EDWARD POLLARD

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**ORDER**

Pursuant to the parties' stipulation, IT IS SO ORDERED. Defendants should answer or otherwise respond to the Complaint in Intervention on or before March 4, 2024.

IT IS SO ORDERED.

Dated: February 1, 2024



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MORRISON C. ENGLAND, JR.  
SENIOR UNITED STATES DISTRICT JUDGE