1 2 3	MATTHEW D. SEGAL (SB #190938) <u>matthew.segal@stoel.com</u> NICHOLAS D. KARKAZIS (SB #299075) <u>nicholas.karkazis@stoel.com</u> STOEL RIVES LLP 500 Capitol Mall, Suite 1600		
4 5	Sacramento, CA 95814 Telephone: 916.447.0700 Facsimile: 916.447.4781		
6 7	Attorneys for Defendants P. Gill Obstetrics & Gynecology Medical Group, In Parampal K. Gill, M.D.; Jasbir S. Gill, M.D.	nc.;	
8			
9	UNITED STATES DISTRICT COURT		
10	EASTERN DISTRICT	EASTERN DISTRICT OF CALIFORNIA	
11	UNITED STATES OF AMERICA AND STATE OF CALIFORNIA ex rel. GAIL JOSEPH, M.D.,	Case No. 2:21-cv-0554-KJM-AC	
12	Plaintiff,	STIPULATION EXTENDING DEFENDANTS' DEADLINE TO	
13	v.	RESPOND TO COMPLAINT AND CONTINUE STATUS (PRETRIAL	
14 15	P. GILL OBSTETRICS & GYNECOLOGY MEDICAL GROUP, INC., a California	SCHEDULING) CONFERENCE; ORDER	
15	professional corporation; PARAMPAL K. GILL, M.D., an individual; JASBIR S. GILL, M.D., an		
17	individual,		
17	Defendants.		
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STOEL RIVES LLP Attorneys At Law	STIPULATION AND ORDER -1-	- 2:21-CV-0554-KJM-A0	

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SACRAMENTO

1	This stipulation ("Stipulation") is entered into by and among Plaintiff GAIL JOSEPH, M.D.		
2	and Defendants P. GILL OBSTETRICS & GYNECOLOGY MEDICAL GROUP, INC.;		
3	PARAMPAL K. GILL, M.D.; JASBIR S. GILL, M.D. (jointly, "Defendants") (collectively		
4	"Parties"), through their respective counsel.		
5	Recitals		
6	1. By entering into this Stipulation, neither Plaintiff nor Defendants waive or concede		
7	any right not specifically addressed herein.		
8	2. The original date for Defendants to file a response to the Complaint was February 1,		
9	2022.		
10	3. The Parties agreed to an initial stipulation extending Defendants' time to respond to		
11	March 3, 2022, pursuant to Local Rule 144.		
12	4. Defendants' response to the Complaint is currently due on March 3, 2022.		
13	5. The Status (Pretrial Scheduling) Conference is currently set for April 7, 2022, at		
14	2:30 PM.		
15	6. The discovery cutoff date, last date for hearing motions, pretrial conference date,		
16	and trial date have not yet been set.		
17	7. The Parties agree that Defendants' deadline to respond to the Complaint shall be		
18	extended by 30 days out of professional courtesy in light of Defendants' counsel's ongoing,		
19	preliminary investigation into the allegations in the Complaint and as a result of Defendants'		
20	retention of new counsel to assist in the handling of the matter.		
21	THEREFORE:		
22	IT IS STIPULATED:		
23	1. The current deadline of March 3, 2022, for Defendants to respond to Plaintiff's		
24	Complaint is extended 30 days and a response shall be filed by or on April 4, 2022.		
25	2. The Status (Pretrial Scheduling) Conference currently scheduled for April 7, 2022,		
26	is continued to May 9, 2022.		
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STOEL RIVES LLP Attorneys At Law Sacramento	STIPULATION AND ORDER -2- 2:21-CV-0554-KJM-AC		

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2	Dated: March 2, 2022	STOEL RIVES LLP
2 3 4		By:/s/ Nicholas D. Karkazis MATTHEW D. SEGAL NICHOLAS D. KARKAZIS Attorneys for Defendants
5		Attorneys for Defendants P. Gill Obstetrics & Gynecology Medical Group, Inc.; Parampal K. Gill, M.D.; Jasbir S. Gill, M.D.
6		Jasbir S. Gill, M.D.
7	Dated: March 2, 2022	THE BRINEGAR LAW FIRM
8		By:/s/ Matthew Brinegar
9 10		By:/s/ Matthew Brinegar MATTHEW BRINEGAR Attorneys for Relator/Plaintiff Gail Joseph, M.D.
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STIPULATION AND ORDER

1	<u>ORDER</u>
2	The court has reviewed the parties' Stipulation, ECF No. 15, and good cause appearing
3	hereby orders:
4	1. The current deadline of March 3, 2022, for defendants to respond to plaintiff's
5	Complaint is extended 30 days. Defendant shall respond on or before April 4, 2022.
6	2. The Status (Pretrial Scheduling) Conference currently scheduled for April 7, 2022,
7	is continued to May 5, 2022, at 2:30 p.m. with the filing of a joint status report due fourteen (14)
8	days prior.
9	DATED: March 14, 2022.
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11	CHIEF UNITED STATES DISTRICT JUDGE
12	CHIEF UNITED STATES DISTRICT JODGE
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STIPULATION AND ORDER