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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

VALERIE GEORGE, as Administrator and  
 Personal Representative of THE ESTATE OF  
 RYAN GEORGE; VALERIE GEORGE and/or  
 TAJMAH BEAUCHAMP, as Legal  
 Representative(s) for Jaida George and Ryan  
 George, Jr.; VALERIE GEORGE, Individually;  
 DONALD GEORGE; and TAJMAH  
 BEAUCHAMP, Individually,

Plaintiffs,

vs.

SONOMA COUNTY SHERIFF'S  
 DEPARTMENT; BILL COGBILL; COUNTY  
 OF SONOMA; CALIFORNIA FORENSIC  
 MEDICAL GROUP, INC; JAMES LUDERS,  
 M.D.; MICHAEL E. DAGEY, R.N.; SUTTER  
 HEALTH; SUTTER MEDICAL CENTER OF  
 SANTA ROSA; EDWARD W. HARD, M.D.;  
 RICHARD FLINDERS, M.D.; JOSEPH N.  
 MATEL, M.D.; NORICK JANIAN, M.D.;  
 ANGUS MATHESON, M.D., and DOES 1  
 through 25, inclusive,

Defendants.

Case No. 3:08-cv-02675-EDL

ECF Case

**STIPULATION AND [PROPOSED]  
 ORDER RE PLAINTIFFS' TIME TO  
 RESPOND TO DEFENDANTS  
 RICHARD FLINDERS, M.D.'S, AND  
 JOSEPH N. MATEL, M.D.'S MOTION  
 TO DISMISS AND NORICK JANIAN,  
 M.D.'S MOTION TO JOIN**

**JURY TRIAL DEMANDED**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for all parties, that subject to the Court's approval, the date for Plaintiffs to respond to Defendants Richard Flinders, M.D.'s and Joseph N. Matel, M.D.'s motion to dismiss and Defendant Norick Janian, M.D.'s motion to join therein shall be as follows:

- (i) Plaintiffs' response to the above-described Defendants' motion to dismiss and motion to join shall be due April 7, 2009.
- (ii) Defendants' respective replies in support of their motions shall be due April 14, 2009.
- (iii) The return date of these motions shall be extended to April 28, 2008.

**SO STIPULATED.**

DATED: March 23, 2009

ROGASKI PREVOLOS WEBER &  
PATTERSON

By: \_\_\_\_\_/s/\_\_\_\_\_  
Chester Rogaski

241 Georgia Street  
Vallejo, CA 94590  
*Attorneys for Defendant Norick Janian, M.D.*

DATED: March 23, 2009

HASSARD BONNINGTON LLP

By: \_\_\_\_\_/s/\_\_\_\_\_  
Joanna Storey

Two Embarcadero Center, Suite 1800  
San Francisco, CA 94111  
*Attorneys for Defendants Richard Flinders,  
M.D. and Joseph N. Matel, M.D.*

DATED: March 23, 2009

SANFORD WITTELS & HEISLER, LLP

By: /s/ Thomas Marc Litton  
Thomas Marc Litton (CA Bar # 119985)

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*Attorneys for Plaintiffs*

March 25, 2009

SO ORDERED:

