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9 Attorneys for Defendants  
 10 JOSEPH R. MATEL, M.D.  
 11 and RICHARD FLINDERS, M.D.

12 IN THE UNITED STATES DISTRICT COURT  
 13 FOR THE NORTHERN DISTRICT OF CALIFORNIA

14 VALERIE GEORGE, et. al.,  
 15 Plaintiffs,  
 16 vs.  
 17 SONOMA COUNTY SHERIFF'S  
 18 DEPARTMENT, et. al.,  
 19 Defendants.

No. C-08-02675 EDL  
**STIPULATION AND  
 [PROPOSED] ORDER  
 AS MODIFIED**  
 Requested Hearing Date: 08-10-2010  
 Honorable Elizabeth D. Laporte  
 Third Amended Complaint Filed:  
 February 24, 2009  
 Jury Trial Date: January 24, 2011

20 Defendants Joseph R. Matel, M.D. and Richard Flinders, M.D. intend to submit  
 21 a motion for determination of good faith settlement. IT IS HEREBY STIPULATED AND  
 22 AGREED, by and between the undersigned counsel, pursuant to Local Rule 6-1(b), that,  
 23 subject to the Court's approval, that the motion for determination of good faith settlement to  
 24 be brought by defendants Joseph R. Matel, M.D. and Richard Flinders, M.D. may be heard on  
 25 shortened time. The reason the parties request the shortened time for the motion is that  
 26 discovery and dispositive motion deadlines are imminent. Also, the minor's compromise was  
 27 only recently approved by the Court.

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The parties further agree to the following briefing schedule:

Motion due: July 27, 2010.

Opposition due: August 3, 2010.

Reply due: August 6, 2010.

Hearing Date: Tuesday, August 10, 2010, at 2:00 p.m.

Dated: July 23, 2010

HASSARD BONNINGTON LLP

*/ S / Joanna L. Storey*

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**Joanna L. Storey**  
Attorneys for Defendants  
JOSEPH R. MATEL, M.D. and RICHARD  
FLINDERS, M.D.

Dated: July 23, 2010

SANFORD WITTELS & HEISLER LLP

*/ S / (as authorized on 07/23/2010)*

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**Steven Wittels**  
Attorneys for Plaintiffs  
VALERIE GEORGE, DONALD GEORGE,  
JAIDA GEORGE, and  
RYAN GEORGE, JR.

Dated: July 23, 2010

SPAULDING, MCCULLOUGH & TANSIL LLP

*/ S / (as authorized on 07/23/2010)*

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**Terry S. Sterling**  
Attorneys for Defendants  
SONOMA COUNTY SHERIFF'S  
DEPARTMENT, BILL COGBILL AND  
COUNTY OF SONOMA

Dated: July 23, 2010

TRIMBLE SHERINIAN & VARANINI

*/ S / (as authorized on 07/22/2010)*

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**Jerome M. Varanini**  
Attorneys for Defendants  
CALIFORNIA FORENSIC MEDICAL  
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JAMES LUDERS, M.D.

1 Dated: July 23, 2010

LAFOLLETTE JOHNSON DEHAAS

2 / S / (as authorized on 07/23/2010)

3 **Larry Byron Thornton**  
4 Attorneys for Defendants  
5 SUTTER HEALTH AND SUTTER  
MEDICAL CENTER OF SANTA ROSA

6 Dated: July 23, 2010

ROGASKI, PREOVOLOS, WEBER & PATTERSON

7 / S / (as authorized on 07/23/2010)

8 **Ralph Andino**  
9 Attorneys for Defendants  
NORICK JANIAN, M.D.


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12 GOOD CAUSE APPEARING THEREFOR, IT IS HEREBY ORDERED that  
13 the motion for determination of good faith settlement by defendants Joseph R. Matel, M.D.  
14 and Richard Flinders, M.D. shall be heard on shortened time with the following briefing  
15 schedule:

16 Motion due: July 27, 2010.  
17 noon on August 2  
18 Opposition due: ~~August 3~~, 2010.  
19 August 3  
20 Reply due: ~~August 6~~, 2010.  
21 Wednesday, August 11  
22 Hearing Date: ~~Tuesday, August 10~~, 2010, at 2:00 p.m.

23 PURSUANT TO STIPULATION, IT IS SO ORDERED.

24 Dated: July 26, 2010

25   
26 Elizabeth D. Laporte  
27 United States Magistrate Judge  
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