

1 MELINDA HAAG (CABN 132612)  
 United States Attorney  
 2 JOANN M. SWANSON (CSBN 88143)  
 Chief, Civil Division  
 3 MELISSA K.B. SLADDEN (CSBN 203307)  
 Assistant United States Attorney

4 450 Golden Gate Avenue, Box 36055  
 5 San Francisco, California 94102-3495  
 Telephone: (415) 436-6962  
 6 FAX: (415) 436-6748  
 melissa.sladden@usdoj.gov

7 Attorneys for Federal Defendant,  
 8 United States of America

9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA  
 11 SAN FRANCISCO DIVISION  
 12

13 JAMIE ESCAMILLA, JR, a minor )  
 individual, by and through his guardian ad )  
 14 litem, JAMIE ESCAMILLA, SR. )

15 Plaintiff, )

16 v. )

17 NOVATO COMMUNITY HOSPITAL, a )  
 orporate entity; SUTTER HEALTH, a )  
 18 corporate entity; UNITED STATES OF )  
 AMERICA; ERIC SCHER, M.D., an )  
 19 individual; DAVID THOMPSON, M.D., an )  
 individual; and DOES 1 through 20, )  
 20 inclusive, )

21 Defendant. )  
 22 \_\_\_\_\_ )

No. C-11-1213 MEJ

**STIPULATION AND [PROPOSED]  
 ORDER TO EXTEND THE  
 MEDIATION DEADLINE**

23  
 24  
 25  
 26  
 27  
 28

STIP AND [PROPOSED] ORDER TO EXTEND MEDIATION DEADLINE C-11-1213 MEJ

1 The plaintiff, Jamie Escamilla Jr., (“Plaintiff”) and the defendants, Novato Community  
2 Hospital, a corporate entity; Sutter Health, a corporate entity; the United States of America; Eric  
3 Scher, M.D., an individual; David Thompson, M.D., an individual (collectively “Defendants”) by  
4 and through their counsel stipulate to the following:

5 WHEREAS, the current deadline by which to complete mediation is December 20, 2011;

6 WHEREAS, the parties were invited by the Court to submit a stipulation to extend the  
7 mediation deadline;

8 WHEREAS, the parties believe it will be beneficial to the mediation to allow for some  
9 discovery to proceed prior to the mediation;

10 WHEREAS, the parties will not be able to complete the necessary discovery prior to  
11 December 20, 2011;

12 WHEREAS, the mediator has consented to this extension;

13 WHEREAS, the parties have tentatively scheduled the mediation for April 23, 2012, but  
14 there is some risk that pre-existing trial dates in other matters may present a conflict;

15 ACCORDINGLY, the parties request that the following dates be adopted by the Court:  
16 that the mediation deadline in this action be extended from December 20, 2011 to June 1, 2012.

17 So Stipulated.

18

19 Dated: October 21, 2011

EDGAR LAW FIRM

20

/S/

21

Jeremy R. Fietz, Esq.  
Attorneys for Plaintiff

22

23 Dated: October 21, 2011

MELINDA HAAG  
United States Attorney

24

/S/

25

Melissa K.B. Sladden  
Assistant United States Attorney  
Attorneys for Defendant  
United States of America

26

27

28

1 Dated: October 21, 2011

GALLOWAY, LUCCHESI, EVERSON &  
PICCHI

2

3

/S/  
\_\_\_\_\_  
Patricia A. Timm, Esq.  
Attorneys for Defendants  
Sutter Health and Sutter West Bay  
Hospitals, dba Novato Community  
Hospital

4

5

6 Dated: October 21, 2011

HASSARD BONNINGTON LLP

7

8

/S/  
\_\_\_\_\_  
Joanna L. Storey, Esq.  
Attorneys for Defendant  
Eric Scher, M.D.

9

10 Dated: October 21, 2011

DONNELLY NELSON DEPOLO &  
MURRAY

10

11

/S/  
\_\_\_\_\_  
Erin R. Sabey, Esq.  
Attorneys for Defendant  
David Thompson, M.D.

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

~~PROPOSED~~ ORDER

Pursuant to the stipulation of the parties, the mediation deadline in this action is extended from December 20, 2011 to June 1, 2012.

IT IS SO ORDERED

Dated: October 21, 2011

  
\_\_\_\_\_  
MARIA-ELEENA JAMES  
United States Magistrate Judge