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11 Attorneys for Defendants Good Samaritan Hospital LP, a
 Delaware limited partnership, Samaritan, LLC, a
 12 Delaware limited liability company, Good Samaritan
 Hospital Medical Staff, a California unincorporated
 13 association, Steven M. Schwartz, M.D., and Bruce G.
 Wilbur, M.D.

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 15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA
 17 SAN FRANCISCO DIVISION

18 J. Augusto Bastidas, M.D.,
 19 Plaintiff,

20 v.

21 Good Samaritan Hospital LP, a Delaware
 limited partnership; Samaritan, LLC, a
 22 Delaware limited liability company; Good
 Samaritan Hospital Medical Staff, a California
 23 unincorporated association; Steven M.
 Schwartz, M.D.; and Bruce G. Wilbur, M.D.,
 24 Defendants.

CASE NO. 5:13-cv-04388-SI

**JOINT STIPULATION AND ~~[PROPOSED]~~
 ORDER TO EXTEND TIME TO FILE
 DISPOSITIVE MOTIONS AND CONTINUE
 RELATED DEADLINES**

Judge: Hon. Susan Illston
 Complaint Filed: September 20, 2013
 Trial Date: November 30, 2015

1 WHEREAS, on August 6, 2014, Plaintiff J. Augusto Bastidas, M.D. filed a Third Amended
2 Complaint against Defendants Good Samaritan Hospital LP, Samaritan, LLC, Good Samaritan
3 Hospital Medical Staff, Steven M. Schwartz, M.D., and Bruce G. Wilbur, M.D. for racial
4 discrimination and retaliation under 42 U.S.C. § 1981; and

5 WHEREAS, on September 17, 2014, the court continued the hearing on Defendants' Motion
6 to Dismiss the Third Amended Complaint to November 12, 2014; and

7 WHEREAS, on October 29, 2014, the court continued the hearing on Defendants' Motion to
8 Dismiss the Third Amended Complaint to November 13, 2014; and

9 WHEREAS, on November 10, 2014, the court issued an order, per the parties' joint
10 stipulation, continuing the hearing on Defendants' Motion to Dismiss the Third Amended Complaint
11 to December 12, 2014, and the Initial Case Management Conference to December 12, 2014; and

12 WHEREAS, under the current schedule in the Pretrial Preparation Order [Dkt. No. 95], the
13 deadline for dispositive motions is August 7, 2015; the deadline for Plaintiff's oppositions to
14 dispositive motions is August 21, 2015; the deadline for Defendants' replies to Plaintiff's oppositions
15 is August 28, 2015; and the hearing on dispositive motions is set for no later than September 11,
16 2015; and

17 WHEREAS, under the current schedule in the Pretrial Preparation Order, the cut-off date for
18 non-expert discovery is July 31, 2015; and

19 WHEREAS, due to scheduling issues with deponents who are medical doctors, due to the
20 amount of relevant information and documents produced and remaining to be produced – including
21 two depositions noticed by Plaintiff that remain to be taken – and the complexity of the pertinent
22 legal and factual issues, the parties have conferred and agreed, subject to the Court's approval, upon
23 the following schedule for briefing regarding any dispositive motions the Parties may file:

- 24 • The Parties' Dispositive Motions shall be filed by August 28, 2015;
- 25 • Oppositions to any Dispositive Motions will be due on September 11, 2015;
- 26 • Reply Briefs in support of Dispositive Motions will be due on September 18, 2015;
- 27 • A hearing on any Dispositive Motions will be held on October 2, 2015, or a date
28 thereafter that is convenient for the Court;

1 WHEREAS, this modification will not alter the date of any other event or deadline fixed by
2 any Court order,

3 IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, that:

- 4 • Dispositive Motions will be filed by August 28, 2015;
- 5 • Opposition Briefs to any Dispositive Motions will be due on September 11, 2015;
- 6 • Reply Briefs in support of any Dispositive Motions will be due on September 18,
7 2015;
- 8 • A Hearing on the Dispositive Motions will be held on October 2, 2015, or a date
9 thereafter that is convenient for the Court.

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1 DATED: August 6, 2015

HENNEFER, FINLEY & WOOD, LLP

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3 BY: /s/James A. Hennefer
4 JAMES A. HENNEFER
5 Attorneys for Plaintiff J. Augusto Bastidas, M.D.

6
7 DATED: August 6, 2015

GIBSON, DUNN & CRUTCHER LLP

8
9 BY: /s/Michael Li-Ming Wong
10 MICHAEL LI-MING WONG
11 VANESSA A. PASTORA
12 Attorneys for Defendants Good Samaritan
13 Hospital, L.P., Samaritan, LLC, Good Samaritan
14 Hospital Medical Staff, Steven M. Schwartz, M.D.,
15 and Bruce G. Wilbur, M.D.

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 8/7, 2015

By: 
HONORABLE SUSAN ILLSTON

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FILER'S ATTESTATION

I, Michael Li-Ming Wong, am the ECF user whose ID and password are being used to file this Joint Stipulation and [Proposed] Order to Extend Time to File Dispositive Motions and Continue Related Deadlines. I hereby attest that James A. Hennefer has concurred in this and has authorized me to affix his electronic signature to this Stipulation.

Dated: August 6, 2015

By: /s/Michael Li-Ming Wong
Michael Li-Ming Wong

1 **CERTIFICATE OF SERVICE**

2 I, Ariella Jones, declare as follows:

3 I am employed in the County of San Francisco, State of California; I am over the age of
4 eighteen years and am not a party to this action; my business address is 555 Mission Street, Suite
5 3000, San Francisco, California 94105, in said County and State. On August 6, 2015, I served the
6 following document(s):

7 **JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO
8 FILE DISPOSITIVE MOTIONS AND CONTINUE RELATED DEADLINES**

9 on the parties stated below, by the following means of service:

10 **James A. Hennefer**
11 Hennefer, Finley & Wood, LLP
12 Embarcadero West, 275 Battery, Second Floor
13 San Francisco, CA 941111
14 415-421-6100
15 415-421-1815 (fax)
16 jhennefer@hennefer-wood.com

- 17 **BY ELECTRONIC TRANSFER TO THE CM/ECF SYSTEM.** On this date, I electronically uploaded a true
18 and correct copy in Adobe "pdf" format the above-listed document(s) to the United States District Court's Case
19 Management and Electronic Case Filing (CM/ECF) system. After the electronic filing of a document, service is
20 deemed complete upon receipt of the Notice of Electronic Filing ("NEF") by the registered CM/ECF users.
- 21 I am employed in the office of Michael Li-Ming Wong, a member of the bar of this court, and that the foregoing
22 document was printed on recycled paper.
- 23 **(FEDERAL)** I declare under penalty of perjury that the foregoing is true and correct.

24 Executed on August 6, 2015.

25 
26 _____
27 Ariella Jones
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