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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

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J. AUGUSTO BASTIDAS, M.D.;

CASE NO. C-13-4388-SI

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PLAINTIFF,

**JOINT STIPULATION AND ~~[PROPOSED]~~
ORDER TO CHANGE DEADLINE TO
RESPOND TO SECOND AMENDED
COMPLAINT**

14

v.

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GOOD SAMARITAN HOSPITAL LP, A
 16 DELAWARE LIMITED PARTNERSHIP;
 GOOD SAMARITAN HOSPITAL LLC, A
 17 DELAWARE LIMITED LIABILITY
 COMPANY; GOOD SAMARITAN
 18 HOSPITAL MEDICAL STAFF, A
 CALIFORNIA UNINCORPORATED
 19 ASSOCIATION; HCA, INC., A DELAWARE
 CORPORATION; STEVEN M. SCHWARTZ,
 20 M.D.; AND BRUCE G. WILBUR, M.D.

21

DEFENDANTS.

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Judge: Hon. Susan Illston
 Complaint Filed: September 20, 2013
 Trial Date: None Set

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C-13-4388-SI

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1 WHEREAS, on March 13, 2014, the Court granted the separate Motions to Dismiss of
2 Good Samaritan Hospital LP, Samaritan LLC, Good Samaritan Hospital Medical Staff, Bruce G.
3 Wilbur. M.D. and Steven M. Schwartz, M.D. (“Good Samaritan Defendants”) and HCA Inc.
4 (“HCA, and collectively with the Good Samaritan Defendants, the “Defendants”) as to Plaintiff’s
5 First Amended Complaint, with leave to amend certain causes of action [Docket No. 56]; and
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7 WHEREAS, Plaintiff filed a Second Amended Complaint on April 16 2014 [Docket No.
8 60]; and
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10 WHEREAS, due to the complexity of the pertinent legal and factual issues, and current
11 conflicts of counsel on other matters, the parties have stipulated to an extension until May 12,
12 2014 for the Defendants to file responses to the Second Amended Complaint; and

13 WHEREAS, the parties agree that this modification to the date by which Defendants are
14 required to respond to the Second Amended Complaint will not affect any other current deadlines
15 in this case.

16 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the parties
17 hereto, with the Court’s permission, that the date by which the Defendants shall serve their
18 responses to the Second Amended Complaint is May 12, 2014.
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20 Respectfully submitted,

21 DATED: April 22, 2014

HENNEFER, FINLEY & WOOD, LLP

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23 BY: /s/ James A. Hennefer

24 JAMES A. HENNEFER

25 Attorneys for Plaintiff J. Augusto Bastidas, M.D.
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FILER'S ATTESTATION

I, George A. Shannon, Jr., hereby attest that concurrence in the filing of this Joint Stipulation and Proposed Order to Change Deadline to Respond to Second Amended Complaint has been obtained from each of the other signatories listed above, each of whom has authorized me to affix his or her electronic signature to this Stipulation.

Respectfully submitted,
SHANNON, MARTIN, FINKELSTEIN, ALVARADO
& DUNNE

By: /s/ George A. Shannon, Jr.
George A. Shannon, Jr.
Attorney for Defendant HCA Inc.

