

1 MELINDA HAAG (CABN 132612)
 United States Attorney
 2 ALEX G. TSE (CABN 152348)
 Chief, Civil Division
 3 JENNIFER S WANG (CABN 233155)
 Assistant United States Attorney

4 450 Golden Gate Avenue, Box 36055
 5 San Francisco, California 94102-3495
 Telephone: (415) 436-6967
 6 FAX: (415) 436-6748
 jennifer.s.wang@usdoj.gov

7 Attorneys for Defendant

8
 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION

12 SANTA ROSA MEMORIAL HOSPITAL,)	CASE NO. C14-1345 SC
)	
13 Plaintiff,)	STIPULATION TO EXTEND DEFENDANT’S
)	DEADLINE TO RESPOND TO AMENDED
14 v.)	COMPLAINT AND TO CONTINUE INITIAL
)	CASE MANAGEMENT CONFERENCE
15 SYLVIA MATHEWS BURWELL, IN HER)	
16 OFFICIAL CAPACITY AS SECRETARY OF)	
17 HEALTH AND HUMAN SERVICES,)	
)	
18 Defendant.		

19 Subject to the approval of the Court, defendant Sylvia Mathews Burwell and plaintiff Santa
 20 Rosa Memorial Hospital, by and through their respective counsel, hereby stipulate as follows:
 21 1. Plaintiff’s Complaint was filed on March 24, 2014. While the parties engaged in initial settlement
 22 discussions, the parties stipulated to extend defendant’s time to respond to the Complaint until
 23 October 30, 2014. On October 30, 2014, defendant filed a motion to dismiss under Federal Rule of
 24 Civil Procedure 12(b)(2) and 12(b)(6).
 25 2. On November 14, 2014, pursuant to stipulation by the parties, the Court ordered plaintiff to file an
 26 Amended Complaint in lieu of filing an opposition to defendant’s motion to dismiss by November
 27 20, 2014. The Court set January 30, 2015 as the deadline for defendant’s response to the Amended
 28

1 Complaint, and continued the initial case management conference to February 20, 2015 at 10:00 a.m.

2 3. Plaintiff filed its Amended Complaint on November 20, 2014.

3 4. The parties are currently engaged in settlement negotiations. To provide further time for those
4 negotiations and to avoid potentially unnecessary litigation, the parties have stipulated to extend
5 defendant's deadline to respond to the Amended Complaint by sixty (60) days, from January 30,
6 2015 until March 31, 2015. For the same reason and so that defendant's responsive pleading is on
7 file before the initial case management conference, the parties respectfully request that the initial
8 case management conference currently set for February 20, 2015, at 10:00 a.m., be continued to
9 April 17, 2015, at 10:00 a.m.

10 IT IS SO STIPULATED.

11 Respectfully submitted,

12 MELINDA HAAG
13 United States Attorney

14 DATED: January 21, 2015

15 /s/
16 _____
17 JENNIFER S WANG
18 Assistant United States Attorney

16 DATED: January 21, 2015

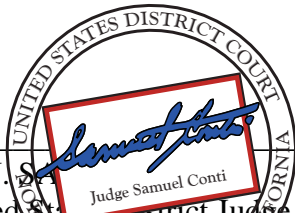
17 /s/
18 _____
19 JASON T. LUNDY
20 POLSINELLI PC
21 Attorneys for Plaintiff,
22 Santa Rosa Memorial Hospital

20 ~~PROPOSED~~ ORDER

21 Pursuant to the parties' stipulation and good cause having been shown, it is ordered that defendant's
22 response to the Amended Complaint is due on or before March 31, 2015. The initial case management
23 conference is continued from February 20, 2015 to April 17, 2015 at 10:00 a.m., and the parties' joint
24 case management statement is due on or before April 10, 2015.

25 IT IS SO ORDERED.

26 DATED: 01/26/2015

27 HON. 
28 United States District Judge
COURT OF APPEALS
DISTRICT OF CALIFORNIA