

1 Alexander F. Giovanniello (CSB # 125562)
GIOVANNIELLO LAW GROUP
 2 One Pointe Drive, Suite 300
 Brea, California 92821
 3
 4 Ph: (714) 364-4000
 Fax: (714) 364-4001

5 Attorneys for:
 6 GRANCARE, LLC dba VALE HEALTHCARE CENTER;
 MARINER HEALTH CARE MANAGEMENT COMPANY AND
 7 SPECIALLY APPEARING FOR MARINER HEALTH CARE, INC.

8 **UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**

11 PRICE J. HALL;)	Case No.: 3:15-CV-02201 MMC
)	
12 Plaintiff,)	JOINT STIPULATION AND ORDER TO
)	CONTINUE THE HEARING DATE ON
13 vs.)	PLAINTIFFS' MOTION FOR REMAND
)	AND DEFENDANTS' MOTION FOR
14 GRANCARE, LLC dba VALE)	LEAVE TO AMEND NOTICE OF
HEALTHCARE CENTER; MARINER)	REMOVAL
15 HEALTH CARE MANAGEMENT)	
COMPANY; MARINER HEALTH CARE,)	
16 INC. FAS, LLC; REMY RHODES and)	
DOES 1-100;)	
)	
)	
18 Defendants)	
)	
)	

21 WHEREAS, the Court currently has on calendar for July 31, 2015, Plaintiffs' Motion for
 22 Remand;

23 WHEREAS, the Court currently has on calendar for July 31, 2015, Defendants' Motion
 24 for Leave to Amend its Notice of Removal;

25 WHEREAS, Counsel for both Plaintiffs and Defendants are unable to appear for oral
 26 argument on July 31, 2015;

27 ///

28 ///

1 THEREFORE, it is stipulated between the parties as follows:

2 1. The above-referenced hearings, currently scheduled for July 31, 2015, shall be
3 continued to August 14, 2015 at 9:00 a.m., or alternatively, to a date convenient for
4 the Court's calendar.

5
6 **IT IS SO STIPULATED:**

7
8 Dated: July 1, 2015

LANZONE MORGAN

9
10 By: /s/ James M. Morgan
11 James M. Morgan
12 COUNSEL FOR PRICE J. HALL

13
14 Dated: July 1, 2015

GIOVANNIELLO LAW GROUP

15
16 By: /s/ Alexander F. Giovanniello
17 Alexander F. Giovanniello
18 COUNSEL FOR GRANCARE, LLC d/b/a VALE
19 HEALTHCARE CENTER; MARINER HEALTH
20 CARE MANAGEMENT COMPANY AND
21 SPECIALLY APPEARING FOR MARINER
22 HEALTH CARE, INC.

23
24 **IT IS SO ORDERED:**

25 1. The hearing date on Plaintiff's Motion for Remand is continued to: August 14, 2015
26 2. The hearing date on Defendant's Motion for Leave to Amend Notice of Removal is
27 continued to: August 14, 2015

28 Dated: July 1, 2015


Judge of the United States District Court –
Northern District of California