

1 Alexander F. Giovanniello (CSB # 125562)  
 Thomas C. Swann (CSB #229422)  
 2 **GIOVANNIELLO LAW GROUP**  
 One Pointe Drive, Suite 300  
 3 Brea, California 92821

4 Ph: (714) 364-4000  
 Fax: (714) 364-4001

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

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

12 PRICE J. HALL;	)	Case No.: 3:15-CV-02201 MMC
	)	
13 Plaintiff,	)	JOINT STIPULATION AND ORDER FOR
	)	PARTIES TO APPEAR AT CASE
14 vs.	)	MANAGEMENT CONFERENCE VIA
	)	TELEPHONE
15 GRANCARE, LLC dba VALE	)	
HEALTHCARE CENTER; MARINER	)	
16 HEALTH CARE MANAGEMENT	)	DATE: August 21, 2015
COMPANY; MARINER HEALTH CARE,	)	TIME: 9:00 A.M.
17 INC. FAS, LLC; REMY RHODES and	)	COURTROOM: 7, 19 <sup>th</sup> Floor
DOES 1-100;	)	
	)	
19 Defendants	)	

21 WHEREAS, the Court currently has a case management conference set for August 21,  
 22 2015;

23 WHEREAS, Plaintiff intends to file a Motion for Remand;

24 WHEREAS, Counsel for both Plaintiffs and Defendants are located in Southern  
 25 California, and given the anticipated Motion for Remand, believe the interests of economy are  
 26 best served if the parties jointly appear for the case management conference via telephone.

27 WHEREAS, Counsel for Plaintiffs, Richard F. Ingle, has agreed to make himself  
 28 available on August 21, 2015 from 10:30 a.m. until such time as the Court telephones the

1 Plaintiff's Counsel at (714) 213-1548.

2 WHEREAS, Counsel for Defendants, Thomas C. Swann, has agreed to make himself  
3 available on August 21, 2015 at 10:30 a.m. until such time as the Court telephones Defense  
4 Counsel at (714) 364-4000.

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

- 6 1. The Case Management Conference, currently set for August 21, 2015 at 9:00 a.m.,  
7 will occur via telephone conference on August 21, 2015 at 10:30 a.m., or at such  
8 time thereafter until the Court telephones the parties.
- 9 2. Plaintiffs' Counsel, Richard F. Ingle, will be available at (714) 213-1548.
- 10 3. Defense Counsel, Thomas C. Swann, will be available at (714) 364-4000

11

12 **IT IS SO STIPULATED:**

13

14 Dated: August 13, 2015

**LANZONE MORGAN**

15

16

By: /s/ Richard F. Ingle  
Richard F. Ingle  
COUNSEL FOR PRICE J. HALL

17

18

19

20 Dated: August 13, 2015

**GIOVANNIELLO LAW GROUP**

21

22

By: /s/ Thomas C. Swann  
Thomas C. Swann  
COUNSEL FOR GRANCARE, LLC d/b/a VALE  
HEALTHCARE CENTER; MARINER HEALTH  
CARE MANAGEMENT COMPANY AND  
SPECIALLY APPEARING FOR MARINER  
HEALTH CARE, INC.

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

**IT IS SO ORDERED:**

1. The Case Management Conference, currently scheduled for August 21, 2015 will occur via telephone conference;
2. Plaintiffs' Counsel is order to make himself available for this conference call at 10:30 a.m. or thereafter until the Court initiates the call at (714) 213-1548;
3. Defendants' Counsel is order to make himself available for this conference call at 10:30 a.m. or thereafter until the Court initiates the call at (714) 364-4000.

Dated: August 13, 2015

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