

1 John F. Hyland (SBN 178875)
 jhyland@rhdtdlaw.com
 2 Jessica Riggin (SBN 281712)
 jriggin@rhdtdlaw.com
 3 RUKIN HYLAND DORIA & TINDALL LLP
 100 Pine Street, Suite 2150
 4 San Francisco, CA 94111
 Telephone: (415) 421-1800
 5 Facsimile: (415) 421-1700

6 Attorneys for Plaintiff
 CHRISTOPHER WADSWORTH, M.D.

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

12 CHRISTOPHER S. WADSWORTH, M.D.,

Case No. 3:15-cv-02322-EMC

13 Plaintiff,

**STIPULATION TO EXTEND TIME TO
 RESPOND AND ALLOW FILING OF
 SECOND AMENDED COMPLAINT**

14 v.

[Civil Local Rule 6-1(a)]

15 JEFFREY BEARD; J. CLARK KELSO;
 TIMOTHY BELAVICH; RACHEL CHEN;
 16 COURTNEY CORRADO; EUREKA DAYE;
 ANDREW DEEMS; ERIC MONTHEI; CHERA
 17 VAN BURG; LAURA WHYTE; and DOES 1
 through 50, inclusive,

Date Action Filed: 5/22/2015
 First Amended Complaint Filed: 6/3/2015

18 Defendants.
 19

20
 21 Pursuant to Local Rule 6-1(a), Plaintiff Christopher Wadsworth and Defendants Jeffrey
 22 Beard, Rachel Chen, Courtney Corrado, Chera Van Burg, Laura Whyte, and J. Clark Kelso
 23 (collectively referred to as “Stipulating Defendants”), through their respective counsel, hereby
 24 stipulate and agree as follows:

25 WHEREAS, the current deadline for at least some of the Stipulating Defendants to respond
 26 to the First Amended Complaint is November 4, 2015;

27 WHEREAS, Rukin Hyland Doria & Tindall LLP substituted into this case on October 30,

28 STIPULATION TO EXTEND TIME TO RESPOND AND ALLOW FILING OF SECOND AMENDED
 COMPLAINT

Case No.: 3:15-cv-02322-EMC

1 2015 as counsel of record for Plaintiff Wadsworth and intend to file on Plaintiff's behalf a second
2 amended complaint;

3 WHEREAS, Rukin Hyland Doria & Tindall LLP require sufficient time to meet and confer
4 with Stipulating Defendants' counsel and to prepare an amended complaint given the voluminous
5 facts and currently pled causes of action in the operative complaint;

6 WHEREAS, Plaintiff intends to file the second amended complaint prior to the Case
7 Management Conference currently scheduled for December 10, 2015, and therefore the extension
8 of time for Plaintiff to file a second amended complaint will not unduly affect or interfere with any
9 conferences or hearings scheduled currently on calendar in this matter;

10 WHEREAS, it is Plaintiff's and the Stipulating Defendants' understanding that the
11 remaining Defendants have not yet secured counsel but will not be prejudiced by this stipulation;

12 WHEREAS, the parties execute this stipulation upon mutual agreement, in good faith, and
13 not for the purpose of causing unwarranted delay; and

14 WHEREAS, the parties have not previously stipulated for an extension of time for Plaintiff
15 to file an amended complaint;

16 The parties now stipulate that (1) Plaintiff shall file his second amended complaint on or
17 before December 7, 2015, and (2) the Stipulating Defendants shall file their respective responsive
18 pleadings thereto not later than January 11, 2015 and, by entering into this stipulation, shall not be
19 deemed to have waived any defenses they have to the second amended complaint.

20 **IT IS SO STIPULATED.**

21 Dated: November 4, 2015

RUKIN HYLAND DORIA & TINDALL LLP

22
23 By: /s/ Jessica Riggin

24 Jessica Riggin
25 John F. Hyland

26 Counsel for Plaintiff Christopher Wadsworth, M.D.

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

Dated: November 3, 2015

OFFICE OF THE ATTORNEY GENERAL

By: 
Lyn Harlan

Counsel for Jeffrey Beard, Rachel Chen, Courtney Corrado, Chera Van Burg, and Laura Whyte

Dated: November __, 2015

FUTTERMAN DUPREE DODD CROLEY MAIER
LLP

By: _____
Martin Dodd
Counsel for J. Clark Kelso

OFFICE OF THE ATTORNEY GENERAL

Dated: November __, 2015

By: _____

Lyn Harlan

Counsel for Jeffrey Beard, Rachel Chen, Courtney Corrado, Chera Van Burg, and Laura Whyte

Dated: November 3, 2015

FUTTERMAN DUPREE DODD CROLEY MAIER
LLP

By: _____



Martin Dodd

Counsel for J. Clark Kelso

IT IS SO ORDERED:

Edward M. Chen
U.S. District Judge

