



1 STIPULATION

2 Pursuant to Civil Local Rules 40-1 and 7-12, the Plaintiff Camino Bell and Defendants  
3 John Muir Health, Angela Percival, and Sara Monahan (hereafter collectively referred to as “the  
4 Parties”), through their attorneys of record, hereby jointly stipulate and request a continuance of  
5 the current trial date of February 27, 2017, to May 8, 2017 or a date thereafter convenient to the  
6 Court based on the good cause set forth below.

7 Plaintiff’s Complaint was filed on October 2, 2015 in the above-entitled court. A case  
8 management conference was held on January 21, 2016. As stated in their Joint Case  
9 Management Statement filed on January 14, 2016, the parties are amenable to private mediation,  
10 and agreed to schedule and complete the agreed upon ADR by August 5, 2016. The discovery  
11 cut-off deadline in the case is August 26, 2016. The trial date for this action is presently set for  
12 February 27, 2017. There has been no prior continuance of the trial date in this matter.

13 The parties have engaged in initial written discovery, and have been diligently working  
14 on completing the same. However, trial counsel for the parties (James Rosen, Elizabeth Bradley,  
15 Michael Bruno, and Hieu Tran) are also counsel in another pending matter entitled *Perez, et al.*  
16 *v. John Muir Health, et al.*, Case No. 15-01792 HSG. The trial and discovery schedule in the  
17 *Perez* matter has been drawn out, impacting counsels’ ability meet ongoing demands of  
18 discovery and trial preparation for this case. This is particularly true because the *Perez* matter  
19 involves a common defendant (John Muir Health), and several of the same key witnesses as the  
20 instant action. The trial in the *Perez* matter has been continued to August 22, 2016, which will  
21 render it difficult to schedule and complete all necessary depositions in this action.

22 The parties believe that a trial continuance, and a continuance of all dates leading up to  
23 the trial, would substantially assist the parties in completing fact discovery, and to participate  
24 meaningfully in ADR.

25 After having engaged in meet and confer discussions and subject to the approval of this  
26 Court, the parties have agreed to continue the trial date and have all dates, including discovery  
27 and motion deadlines, as follows:

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Event	Current Date	Proposed Date
Deadline to Complete ADR	August 5, 2016	October 14, 2016
Fact Discovery Cutoff	August 26, 2016	November 4, 2016
Deadline to Exchange Initial Expert Reports	October 7, 2016	December 16, 2016
Deadline for Hearing Pretrial Motions	November 3, 2016	January 12, 2017 – 1:30 p.m.
Expert Discovery Cutoff	November 18, 2016	February 3, 2017
Pretrial Conference	January 26, 2017 – 10 a.m.	April 6, 2017 – 10 a.m.
Jury Trial	February 27, 2017 – 9 a.m. 10 days	May 8, 2017 – 9 a.m. a.m. 10 days

Dated: May 13, 2016

GORDON REES SCULLY MANSUKHANI LLP

By: /s/ Hieu Tran  
MICHAEL D. BRUNO  
HIEU TRAN  
Attorneys for Defendants  
JOHN MUIR HEALTH, ANGELA PERCIVAL, SARA  
MONAHAN

Dated: May 13, 2016

ROSEN SABA LLP

By: /s/ Elizabeth Bradley  
JAMES R. ROSEN  
ELIZABETH L. BRADLEY  
Attorneys for Plaintiff  
CAMINO BELL

**[PROPOSED] ORDER**

Having considered the Parties' Joint Stipulation to Continue Trial Date, Pretrial Conference, and Certain Pretrial Deadlines, as well as the Court's schedule, the Court hereby continues the Trial dates and all Pretrial dates as requested.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 5/13/16

  
RICHARD SEEBORG  
United States District Judge