



1 **STIPULATION**

2 Pursuant to the Case Management Conference held on September 1, 2016, and the Civil  
3 Local Rule 7-12, the Plaintiff Camino Bell and Defendants John Muir Health, Angela Percival,  
4 and Sara Monahan (hereafter collectively referred to as “the Parties”), through their attorneys of  
5 record, hereby jointly stipulate and request a continuance of the current fact discovery deadline  
6 of November 4, 2016 to December 5, 2016, and the current deadline to disclose expert  
7 disclosures of December 16, 2016 to January 13, 2017 based on the good cause set forth below.

8 Plaintiff’s Complaint was filed on October 2, 2015 in the above-entitled court. A case  
9 management conference was held on September 1, 2016. See Docket #1. The case was referred  
10 to Magistrate Judge Joseph C. Spero for settlement purposes. See Docket #27. A Settlement  
11 Conference is scheduled for November 3, 2016. See Docket #28. The discovery cut-off  
12 deadline in the case is November 4, 2016. See Docket #21. The current deadline to exchange  
13 expert disclosures in the case is December 16, 2016. See Docket #21. The trial date for this  
14 action is presently set for May 8, 2017. See Docket #21.

15 The parties believe that a brief continuance of the discovery deadlines will allow the  
16 parties to participate meaningfully in settlement negotiations at the upcoming settlement  
17 conference scheduled for November 3, 2016, while still allowing time for the parties to complete  
18 fact discovery and exchange expert disclosures prior to the proposed deadlines.

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1 Subject to the approval of this Court, the parties have agreed to continue the fact  
2 discovery deadline from November 4, 2016 to December 5, 2016 and the current deadline to  
3 exchange expert disclosures be continued from December 16, 2016 to January 13, 2017. The  
4 parties have also agreed to set a deposition schedule in good faith in the event that mediation is  
5 unsuccessful.

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7 Dated: October 5, 2016

GORDON REES SCULLY MANSUKHANI LLP

8  
9 By: /S/ Hieu Tran

10 MICHAEL D. BRUNO

HIEU TRAN

11 Attorneys for Defendants

JOHN MUIR HEALTH, ANGELA PERCIVAL, SARA  
12 MONAHAN

13 Dated: October 5, 2016

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14  
15 By: /S/ James R. Rosen

16 JAMES R. ROSEN

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17 Attorneys for Plaintiff

CAMINO BELL

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19 **PROPOSED ORDER**

20 Having considered the Parties' Joint Stipulation to Continue the Fact Discovery Deadline,  
21 as well as the Court's schedule, the Court hereby continues fact discovery deadline to December  
22 5, 2016 and the deadline to exchange expert disclosures to January 13, 2017 as requested.

23 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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25 Dated: 10/5/16



26 RICHARD SEEBORG  
27 United States District Judge  
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