Camino Bell v. John	Muir Health et al	Do
1 2 3 4	JAMES R. ROSEN (SBN: 119438) JROSEN@ROSENSABA.COM ELIZABETH L. BRADLEY (SBN: 172272) EBRADLEY@ROSENSABA.COM ROSEN SABA LLP 9350 Wilshire Blvd. Suite 250 Beverly Hills, CA 90212 Telephone: (310) 285-1727	
5 6	Facsimile: (310) 285-1728  Attorneys for Plaintiffs CAMINO BELL	
7		
8 9 10 11	MICHAEL D. BRUNO (SBN: 166805) MBRUNO@GORDONREES.COM HIEU TRAN (SBN: 280585) HTRAN@GORDONREES.COM GORDON REES SCULLY MANSUKHANI L 275 Battery Street, Suite 2000 San Francisco, CA 94111 Telephone: (415) 986-5900	LP
	Facsimile: (415) 986-8054	
12 13	Attorneys for Defendant JOHN MUIR HEALTH, ANGELA PERCIVAL	L and
14	SARA MONAHAN	
15	UNITED STATES	DISTRICT COURT
16	NORTHERN DISTRICT OF CALIFORNIA	
17		
18	CAMINO BELL, an individual,	) CASE NO. 15-CV-04564 - RS
19	Plaintiff,	) ) STIPULATION AND [ <del>PROPOSED]</del>
20	VS.	<ul><li>ORDER REGARDING CONTINUANCE</li><li>OF FACT DISCOVERY DEADLINE TO</li></ul>
21 22	JOHN MUIR HEALTH, a California corporation, JOHN MUIR MEDICAL CENTER, an unknown business entity, and	<ul> <li>DECEMBER 5, 2016 AND EXPERT</li> <li>DISCOVERY DEADLINE TO</li> <li>JANUARY 13, 2017</li> </ul>
23	DOES 1-20, et al	)
24	Defendants.	) Hon. Judge Richard Seeborg
25		Complaint Filed: October 2, 2015
26	///	
27		
28		1
		ARDING CONTINUANCE OF FACT DISCOVERY ND EXPERT DISCOVERY DEADLINE TO

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## **STIPULATION**

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Pursuant to the Case Management Conference held on September 1, 2016, and the Civil Local Rule 7-12, the Plaintiff Camino Bell and Defendants John Muir Health, Angela Percival, and Sara Monahan (hereafter collectively referred to as "the Parties"), through their attorneys of record, hereby jointly stipulate and request a continuance of the current fact discovery deadline of November 4, 2016 to December 5, 2016, and the current deadline to disclose expert disclosures of December 16, 2016 to January 13, 2017 based on the good cause set forth below. Plaintiff's Complaint was filed on October 2, 2015 in the above-entitled court. A case management conference was held on September 1, 2016. See Docket #1. The case was referred to Magistrate Judge Joseph C. Spero for settlement purposes. See Docket #27. A Settlement Conference is scheduled for November 3, 2016. See Docket #28. The discovery cut-off deadline in the case is November 4, 2016. See Docket #21. The current deadline to exchange expert disclosures in the case is December 16, 2016. See Docket #21. The trial date for this action is presently set for May 8, 2017. See Docket #21. The parties believe that a brief continuance of the discovery deadlines will allow the parties to participate meaningfully in settlement negotiations at the upcoming settlement conference scheduled for November 3, 2016, while still allowing time for the parties to complete fact discovery and exchange expert disclosures prior to the proposed deadlines. /// /// /// /// /// /// /// /// ///

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 ROSEN SABA LLP		
14			
15	By: <u>/S/ James R. Rosen</u> JAMES R. ROSEN		
16	ELIZABETH L. BRADLEY Attorneys for Plaintiff		
17	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.		
24	2.1.1		
25	Dated: 10/5/16  RICHARD SEEBORG		
26	United States District Judge		
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