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9 *Attorneys for Plaintiff*

10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**

12 **LUCY ATAYDE**, Individually and as)
 Successor in Interest of Decedent **RICHARD**)
 13 **MICHAEL RAMIREZ**,)
)
 14 Plaintiff,)
 vs.)

Case No. 3:16-cv-00038-TEH
 Hon. Thelton E. Henderson

16 **NAPA STATE HOSPITAL, STATE OF**)
CALIFORNIA DEPARTMENT OF)
 17 **STATE HOSPITALS**, a public entity,)
 18 **DOLLY MATTEUCCI**, Individually, **DANA**)
WHITE, R.N., Individually, **CALIFORNIA**)
 19 **FORENSIC MEDICAL GROUP, INC.**,)
TAYLOR FITHIAN, M.D., **HEATHER**)
 20 **GOODE, M.D.**, **SEAN RYAN, R.N.**,)
DEBORAH MANDUJANO, R.N., **CORINA**)
 21 **DENNING, R.N.**, **COUNTY OF MERCED**,)
 a municipal corporation, former Sheriff **TOM**)
 22 **CAVALLERO**, in his Individual and Official)
 Capacities, Undersheriff **JASON GOINS**, and)
 23 **DOES 1 THROUGH 10**, Jointly and)
 Severally,)
 24 Defendants.)
 25)

STIPULATION AND ~~(PROPOSED)~~
ORDER TO CONTINUE HEARING
DATE FOR DEFENDANTS' MOTION
TO DISMISS OR TRANSFER VENUE
(DOCKET 12) AND MOTION TO
TRANSFER VENUE (DOCKET 25)

1 PLAINTIFF, AND DEFENDANTS, THROUGH THEIR RESPECTIVE COUNSEL
2 OF RECORD, HEREBY STIPULATE, AND REQUEST THIS COURT TO ORDER, that the
3 hearing date regarding the State Defendants' Motion to Dismiss or Transfer Venue (Doc. 12)
4 and the Merced County and CFMG Defendants' Motion to Transfer Venue (Doc. 25) be
5 amended as follows:

- 6 1. The hearing date on Defendants' Motions (Docs. 12 and 25) will be continued
7 from 10:00 a.m. on March 14, 2016 to 10:00 a.m. on March 21, 2016.

8 Good cause exists for continuing the hearing on Defendants' motions. Plaintiff's lead
9 trial counsel, Michael J. Haddad and Julia Sherwin, will both be out of state on March 14,
10 2016. The briefing schedule on both motions will remain unchanged.

11 SO STIPULATED.

12
13 Dated: February 9, 2016

HADDAD & SHERWIN LLP

14 By: /s/ T. Kennedy Helm

15 T. KENNEDY HELM
Attorneys for Plaintiff

16
17 Dated: February 9, 2016

LAW OFFICE OF
SANJAY S. SCHMIDT

18
19 By: /s/ Sanjay S. Schmidt*

20 SANJAY S. SCHMIDT
Attorneys for Plaintiff

21 Dated: February 9, 2016

22 KAMALA D. HARRIS
Attorney General of California
23 JOHN P. DEVINE
Supervising Deputy Attorney
24 General

25 By: /s/ Paul T. Hammerness*

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PAUL T. HAMERNESS
Attorney for Defendants
Napa State Hospital
(NSH), California
Department of State
Hospitals, Dolly
Matteucci, and
Dana White

Dated: February 9, 2016

THE LAW OFFICES OF
JEROME M. VARANINI

By: /s/ Jerome M. Varanini*


JEROME M. VARANINI
Attorney for Defendants
Merced County; CFMG, Inc.;
Taylor Fithian, M.D.; Tom
Cavallero; Corina Denning;
Jason Goins; Heather Goode;
Deborah Mandjuano; and Sean
Ryan

*Mr. Hammerness, Mr. Varanini, and Mr. Schmidt provided their consent that this document
be ECF filed with their electronic signatures.

1 **[PROPOSED] ORDER**

2 PURSUANT TO STIPULATION, IT IS SO ORDERED that the hearing on
3 Defendants' Motion to Dismiss or Transfer Venue (Doc. 12) and Motion to Transfer Venue
4 (Doc. 25) shall be continued from Monday, March 14, 2016 at 10:00 a.m. to Monday, March
5 21, 2016 at 10:00 a.m.

6
7 Date: 02/10/2016


8 HONORABLE THELTON E.
9 HENDERSON
10 United States District Judge