

1 Michael C. Wenzel, State Bar No. 215388
 Talia B. Saypoff, State Bar No. 284704
 2 BERTRAND, FOX, ELLIOT, OSMAN & WENZEL
 3 The Waterfront Building
 2749 Hyde Street
 4 San Francisco, California 94109
 Telephone: (415) 353-0999
 5 Facsimile: (415) 353-0990
 Email: mwenzel@bfesf.com

6
 7 Attorneys for Defendants
 COUNTY OF ALAMEDA, NANCY E. O'MALLEY,
 8 JOHN PAUL WILLIAMS and EDDIE BERMUDEZ

9
 10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

12 GARY MARTINOVSKY, M.D., and
 INTEGRATED PAIN CARE, INC.,

Case No. 3:16-cv-00403-MMC

13
 14 Plaintiffs,

**STIPULATED REQUEST FOR ORDER
 CHANGING TIME OF CASE MANAGEMENT
 CONFERENCE AND ~~PROPOSED~~ ORDER**

15 v.

16 COUNTY OF ALAMEDA, DISTRICT
 ATTORNEY NANCY E. O'MALLEY, in Her
 17 Official and Individual Capacities, DA
 INSPECTORS JOHN PAUL WILLIAMS and
 18 EDDIE BERMUDEZ, CALIFORNIA
 DEPARTMENT OF INSURANCE
 19 DETECTIVE FERNANDO CUBANGBANG,
 20 and DOES 1 to 20,

21 Defendants.

Hon. Maxine M. Chesney

23 Pursuant to United States District Court, Northern District of California Local rule 6-2 (a), and as
 24 supported by the Declaration of Talia Saypoff filed herewith, the parties through undersigned counsel
 25 hereby stipulate and respectfully request that the Court enlarge time for the Case Management
 26 Conference, currently set for April 22, 2016. The parties declare in support of this request:

27 WHEREAS, on January 22, 2016 plaintiffs filed their original Complaint for damages;

28 WHEREAS, on April 7, 2016 pursuant to an agreed-upon extension of time, defendants

1 COUNTY OF ALAMEDA, NANCY E. O'MALLEY, JOHN PAUL WILLIAMS and EDDIE
2 BERMUDEZ filed their Notice of Motion, Motion to Dismiss and Motion for More Definite Statement;

3 WHEREAS, on April 8, 2016, defendant FERNANDO CUBANGBANG filed his Notice of
4 Motions, Motion to Dismiss, Motion for More Definite Statement and Request for Stay;

5 WHEREAS, the hearing on all defendants' Motions to Dismiss, Motions for More Definite
6 Statement and Request for Stay are set for May 20, 2016;

7 WHEREAS, the Case Management Conference is set for April 22, 2016 and the Case
8 Management Statement and Initial Disclosures are due on April 14, 2016; and

9 WHEREAS, the parties are in agreement that in the interest of judicial efficiency, the Case
10 Management Conference should be continued to a date on or after the hearing on defendants' Motions to
11 Dismiss, Motions for More Definite Statement and Request for Stay.

12
13 IT IS HEREBY STIPULATED AND AGREED, subject to court approval, by and between the
14 undersigned counsel on behalf of the parties as follows:

15
16 Pursuant to Northern District Civil Local Rule 6-2, the April 22, 2016 Case Management
17 Conference is continued to a date on or after May 20, 2016;

18
19 Dated: April 12, 2016

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

20
21 By: /s/Talia Saypoff

22 Michael C. Wenzel

23 Talia B. Saypoff

24 Attorneys for Defendants

25 COUNTY OF ALAMEDA, NANCY E. O'MALLEY,
26 JOHN PAUL WILLIAMS and EDDIE BERMUDEZ

27 //

28 //

//

