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17 **UNITED STATES DISTRICT COURT**  
 18 **NORTHERN DISTRICT OF CALIFORNIA**

19 JEREMY LAPACHET, )  
 20 )  
 21 Plaintiff, )  
 22 vs. )  
 23 CALIFORNIA FORENSIC MEDICAL )  
 24 GROUP, INC., TAYLOR FITHIAN, M.D., )  
 25 LANI ANTONIO, P.A., VERONICA )  
 BERGHORST, R.N., JESSAMAE )  
 TRINIDAD, R.N., GRASHIKA DEVENDRA, )  
 Psychiatric R.N., TABITHA KING, L.V.N., )  
 AMARDEEP TAWANA, L.V.N., JUDITH )  
 ALEJANDRE, L.V.N. COUNTY OF )  
 STANISLAUS, a municipal corporation, )  
 Stanislaus County Sheriff ADAM )  
 CHRISTIANSON, and DOES 1-50, Jointly )  
 and Severally, )

Defendants. )

Case No. 3:16-cv-06959-HSG

**STIPULATION AND ORDER RE:  
 BRIEFING SCHEDULE FOR  
 DEFENDANTS' MOTIONS TO CHANGE  
 VENUE**

1  
2 **STIPULATION**

3 The parties, by and through their respective attorneys of record, hereby stipulate and  
4 agree as follows:

5  
6 1. On February 13, 2017, County of Stanislaus filed a Motion to Change Venue,  
7 and the Court set a Motion Hearing for April 13, 2017 at 11:00 a.m.

8 2. On February 17, 2017 the CFMG Defendants filed a Motion to Dismiss or in  
9 the Alternative Transfer Venue, and Court set the hearing date for April 27,  
10 2017 at 2:00 p.m.

11 2. On February 17, 2017, the Court reset the hearing date for County of  
12 Stanislaus' Motion to Change Venue to April 27, 2017 at 2:00 p.m.

13 3. The parties jointly request that the Court continue the briefing schedule as  
14 follows:

15 a) Plaintiff's Opposition due on or before April 3, 2017;

16 b) Defendants' Replies due on or before April 10, 2017.

17 4. Good cause exists, because Plaintiff's co-counsel, Haddad & Sherwin LLP,  
18 just appeared in this action on February 17, 2017 (Doc. 26), and Plaintiff's counsel has several  
19 other major deadlines and responsibilities in other pending cases that would make it impossible  
20 to adequately brief opposition papers to Defendants' motions by the current deadline of  
21 February 27, 2017. Further, since the hearing date for both motions already has been  
22 consolidated to April 27, 2017, there is sufficient time for the parties and court to brief and  
23 review responses and replies according to normal deadlines pegged to the new hearing date.

24 5. For these reasons, all parties stipulate and request that this Court enter the  
25 following order adjusting the briefing schedule for these motions.

1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

2 Dated: February 23, 2017

HADDAD & SHERWIN LLP

3 /s/ Michael J. Haddad

4 MICHAEL J. HADDAD  
5 Attorneys for Plaintiff  
6 JEREMY LAPACHET

7 Dated: February 22, 2017

BERTLING & CLAUSEN, LLP

8 /s/ Jemma Saunders\*

9 JEMMA PARKER SAUNDERS  
10 Attorneys for Defendants CFMG, Fithian, Antonio,  
11 Berghorst, Trinidad, Devendra, King, Tawana, Alejandro

12 Dated: February 22, 2017

RIVERA & ASSOCIATES

13 /s/ Jesse Manuel Rivera\*


14 JESSE MANUEL RIVERA  
15 Attorneys for Defendants County of Stanislaus, Sheriff  
16 Adam Christianson

17 \*Ms. Saunders and Mr. Rivera give their consent to file this stipulation with their  
18 electronic signatures.

**ORDER**

PURSUANT TO STIPULATION, AND GOOD CAUSE APPEARING, IT IS SO ORDERED. Plaintiff's Responses in opposition to Defendants' motions to change venue are due no later than April 3, 2017, and Defendants' replies are due no later than April 10, 2017.

Dated: February 23, 2017

  
Hon. Haywood S. Gilliam, Jr.  
UNITED STATES DISTRICT COURT