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6 Attorneys for Defendants  
 KEVIN MOLANDER, M.D., RONALD CORDOVA, M.D. and JOHN KELSEY, M.D.

7  
 8 IN THE UNITED STATES DISTRICT COURT  
 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 10 OAKLAND DIVISION

11 ALLEN FARON and NANCY FARON, Case No. 4:07-CV-05602-SBA

12 Plaintiff,

Hon. Sandra B. Armstrong

13 vs.

**STIPULATION AND ORDER TO EXTEND  
 DEADLINES TO COMPLETE EXPERT  
 DISCOVERY**

14 ST. JOSEPH HOSPITAL; ST. JOSEPH  
 HEALTH SYSTEM; EUREKA COMMUNITY  
 15 HEALTH CENTER; KEVIN MOLANDER, M.D.;  
 JOHN KELSEY, M.D.; RONALD CORDOVA,  
 16 M.D.; and DOES 1 THROUGH 50, inclusive,

17 Defendants.

18 In light of plaintiff Allen Faron's hospitalizations of May 2008 and September 2008, and  
 19 the need for experts to review records related to these most recent hospitalizations, the parties,  
 20 by and through their attorneys, hereby stipulate and request that the deadlines to complete  
 21 expert discovery be extended as follows:

22 1. The deadline for expert disclosures shall be extended from October 10, 2008  
 23 until November 10, 2008.

24 2. The deadline for disclosure of rebuttal experts shall be extended from  
 25 October 24, 2008 to no later than December 10, 2008.

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**PROOF OF SERVICE BY MAIL – C.C.P. §§1013(A), 2015.5**

I declare under penalty of perjury that:

I am a citizen of the United States and am employed in the County of Contra Costa. I am over the age of eighteen years and not a party to the within action. My business address is 1676 North California Boulevard, Suite 500, Walnut Creek, CA 94596-4183. On September 15, 2008, I served the within **STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES TO COMPLETE EXPERT DISCOVERY** on the parties in this action by placing a true copy thereof, enclosed in a sealed envelope with postage thereon fully paid, in the United States mail at Walnut Creek, California, addressed as follows:

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United States Attorney's Office  
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Executed on September 15, 2008 at Walnut Creek, California.

/s/ \_\_\_\_\_  
Donna M. Anderson