2 3	G. PATRICK GALLOWAY, ESQ. (State Bar No. 49442) JOSEPH E. FINKEL, ESQ. (State Bar No. 167397) GALLOWAY, LUCCHESE, EVERSON & PICCHI A Professional Corporation 1676 North California Blvd., Suite 500 Walnut Creek, CA 94596-4183 Tel. No. (925) 930-9090 Fax No. (925) 930-9035 E-mail: jfinkel@glattys.com				
6 7	Attorneys for Defendants KEVIN MOLANDER, M.D., RONALD CORDOVA, M.D. and JOHN KELSEY, M.D.				
8	IN THE UNITED STATES DISTRICT COURT				
9	FOR THE NORTHERN DI	FOR THE NORTHERN DISTRICT OF CALIFORNIA			
10	OAKLAND	D DIVISION			
11	ALLEN FARON and NANCY FARON,	Case No.	4:07-CV-05602-SBA		
12	Plaintiff,		Hon. Saundra B. Arm	strong	
13	vs.		STIPULATION AND ORDER TO EXTEND		
14		DEADLINES TO COMPLETE EXPERT DISCOVERY			
15 16	HEALTH SYSTEM; EUREKA COMMUNITY HEALTH CENTER; KEVIN MOLANDER, M.D.; JOHN KELSEY, M.D.; RONALD CORDOVA, M.D.; and DOES 1 THROUGH 50, inclusive,				
17	Defendants.	_			
18	In light of plaintiff Allen Faron's hospitali	zations of I	May 2008 and Septerr	ber 2008, and	
19	the need for experts to review records related to	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			ober 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.				
26	//				
27	//				
28 GALLOWAY, LUCCHESE,	//	1			
EVERSON & PICCHI 1676 North California Blvd. Suite 500	1 4:07-CV-05602-SBA: STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES 200-7842/JEF/380947.doc				
Walnut Creek, CA 94596 (925) 930-9090	TO COMPLETE EXPERT DISCOVERY			Dockets.Justia.c	

1	3. The deadline for completion of expert discovery shall be extended from			
2	November 21, 2008 until December 22, 2008.			
3	The deadline to complete factual discovery remains the same. The parties believe that			
4	this extension will help facilitate a possible mediated settlement.			
5	Dated: September 15, 2008	Respectfully submitted,		
6				
7		By: /s/ Fabrice Vincent		
8		LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP		
9		FABRICE N. VINCENT/KENT L. KLAUDT Embarcadero Center West		
10		275 Battery Street, 30th Floor		
11		San Francisco, CA 94111-3339 Attorneys for Plaintiff Allen Faron		
12				
13	Dated: September 15, 2008	By:/s/		
14		By: <u>//s/</u> Andrew Y.S. Cheng		
15		UNITED STATES ATTORNEY'S OFFICE ANDREW Y. S. CHENG		
16		Northern District of California		
17		450 Golden Gate Avenue, 9th Floor San Francisco, CA 94102		
		Attorneys for Defendant United States of America (Eureka Community Health Center)		
18				
19	Dated: September 15, 2008	By: <u>/s/</u> Nancy K. Delaney		
20				
21		MITCHELL, BRISSO, DELANEY & VRIEZE NANCY K. DELANEY		
22		814 Seventh Street P.O. Drawer 1008		
23		Eureka, CA 95502 Attorney for Defendant St. Joseph's Hospital		
24				
25	//			
26	//			
27	//			
	//	2		
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Walnut Creek, CA 94596 (925) 930-9090	TO COMPLETE EXPERT DISCOVERY	OPOSED] ORDER TO EXTEND DEADLINES 200-7842/JEF/380947.doc		

1	Dated: September 15, 2008 By: /s/	
2	Joseph E. Finkel	
3 4	GALLOWAY, LUCCHESE, EVERSON & PICCHI, APC G. PATRICK GALLOWAY/JOSEPH E. FINKEL 1676 No. California Blvd., Suite 500	
5	Walnut Creek, CA 94596-4183 Attorneys for Defendants Ronald Cordova, Kevin Molander, and John Kelsey	
6		
7	ORDER	
8	The Court, having considered the stipulation of the parties, hereby extends the deadlines	
9	to complete expert disclosures to November 10, 2008, rebuttal expert disclosures to December	
10	10, 2008, and expert discovery to December 22, 2008.	
11	All other dates will remain the same.	
12	IT IS SO ORDERED.	
13		
14	9/18/08Baundre B. Ormethag	
15	SAUNDRA BROWN ARMSTRONG U.S. DISTRICT JUDGE	
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28 GALLOWAY, LUCCHESE, EVERSON & PICCHI 1676 North California Blvd. Suite 500	3 4:07-CV-05602-SBA: STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES 200-7842/JEF/380947.dod	
Walnut Creek, CA 94596 (925) 930-9090	TO COMPLETE EXPERT DISCOVERY	

1	PROOF OF SERVICE BY MAIL – C.C.P. §§1013(A), 2015.5			
2	I declare under penalty of perjury that:			
3	I am a citizen of the United States and am employed in the County of Contra Costa. I			
4	am over the age of eighteen years and not a party to the within action. My business address is			
5	1676 North California Boulevard, Suite 500, Walnut Creek, CA 94596-4183. On September 15,			
6	2008, I served the within STIPULATION AND [PROPOSED] ORDER TO EXTEND			
7	DEADLINES TO COMPLETE EXPERT DISCOVERY on the parties in this action by placing a			
8	true copy thereof, enclosed in a sealed envelope with postage thereon fully paid, in the United			
9	States mail at Walnut Creek, California, addressed as follows:			
10	Fabrice N. Vincent, Esq. Kent L. Klaudt, Esq.	Counsel for Plaintiffs		
11				
12	San Francisco, CA 94111-3339			
13	Nancy K. Delaney, Esq. Mitchell, Brisso, Delaney & Vrieze	Counsel for Defendant St. Joseph Hospital		
14				
15	Eureka, CA 95502			
16	Andrew Y.S. Cheng Joann M. Swanson	Counsel for Def. Eureka Community Health Center		
17				
18	450 Golden Gate Ave., 9th Flr. San Francisco, CA 94102			
19	Executed on September 15, 2008 at Walnut Creek, California.			
20	Executed on September 15, 2006 at Walnut Creek, California.			
21	<u>/s/</u> Donna M. Anderson			
22				
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24				
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27				
28 GALLOWAY, LUCCHESE,		4		
EVERSON & PICCHI 1676 North California Blvd. Suite 500 Walnut Creek, CA 94596 (925) 930-9090	4:07-CV-05602-SBA: STIPULATION AND [PROPOSED] O TO COMPLETE EXPERT DISCOVERY			