

1 LORI E. PEGG, Acting County Counsel (S.B. #129073)
 2 MARK F. BERNAL, Deputy County Counsel (S.B. #173923)
 3 OFFICE OF THE COUNTY COUNSEL
 4 70 West Hedding Street, East Wing, Ninth Floor
 5 San Jose, California 95110-1770
 6 Telephone: (408) 299-5900
 7 Facsimile: (408) 292-7240

8 Attorneys for Defendants
 9 COUNTY OF SANTA CLARA
 10 (Erroneously Sued As Santa Clara County Jail)
 11 MARK RITCHIE, M.D., AMARJIT GREWAL, M.D.,
 12 BEVERLY PURDY, M.D., OFFICER GILL,
 13 LAURA RODRIGUEZ, DENNIS GILLOTTE,
 14 GILDA VERSALES, M.D.

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA

17 CARLOS ARMANDO ORTEGA,

18 Plaintiff,

19 v.

20 SANTA CLARA COUNTY JAIL, et al.,

21 Defendants.

No. C09-5527 SBA

**DEFENDANTS' REQUEST FOR
 EXTENSION OF TIME TO FILE A
 DISPOSITIVE MOTION**

22 I, Mark F. Bernal, declare as follows:

23 1. I am an attorney duly licensed to practice law in the State of California and am
 24 admitted to practice in the Northern, Eastern and Southern Districts of this Court. I am the attorney
 25 representing all Defendants who have appeared in this action.

26 2. This is Defendants' first request for an extension of time to file a dispositive motion.

27 As explained in greater detail, below, the primary reason for this request is that the nature of the
 28 claims presented requires multiple consulting witnesses to review almost three years of medical,
 psychiatric and pharmaceutical records, and then prepare declarations in support of a summary
 judgment motion, which cannot be completed within the time period established by the Order of
 Service.

///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

The Defendants having applied for an extension of time within which to file a Motion for Summary Judgment and good cause appearing therefor,

IT IS HEREBY ORDERED, ADJUDGED and DECREED that:

Defendants shall file a Motion for Summary Judgment or other dispositive motion no later than January 25, 2013.

Dated: 12/13/12


SAUNDRA BROWN ARMSTRONG
United States District Judge

1 UNITED STATES DISTRICT COURT
2 FOR THE
3 NORTHERN DISTRICT OF CALIFORNIA

4 CARLOS A. ORTEGA,

5 Plaintiff,

6 v.

7 SAN JOSE CITY OF et al,

8 Defendant.

9
10
11 Case Number: CV09-05527 SBA

12 **CERTIFICATE OF SERVICE**

13 I, the undersigned, hereby certify that I am an employee in the Office of the Clerk, U.S. District
14 Court, Northern District of California.

15 That on December 14, 2012, I SERVED a true and correct copy(ies) of the attached, by placing said
16 copy(ies) in a postage paid envelope addressed to the person(s) hereinafter listed, by depositing said
17 envelope in the U.S. Mail, or by placing said copy(ies) into an inter-office delivery receptacle
18 located in the Clerk's office.

19
20 Carlos A. Ortega #09071890
21 Santa Clara County Corrections - San Jose
22 #CTL532
23 885 N. San Pedro Street
24 San Jose, CA 95110

25 Dated: December 14, 2012

26 Richard W. Wieking, Clerk

27 Lisa Clark, Deputy Clerk

28 By: