1 SEYFARTH SHAW LLP Kari Erickson Levine (SBN 146101) 2 Cody D. Knight (SBN 257627) 560 Mission Street, 31st Floor 3 San Francisco, California 94105 Telephone: (415) 397-8549 Attorneys for Defendants 5 KAISER FOUNDATION HEALTH PLAN, INC., KAISER FOUNDATION HOSPITALS 6 BINGHAM MCCUTCHEN 7 Wendy M. Lazerson (SNB 97285) 1900 University Avenue, 4 th Floor 8 East Palo Also, CA 94303 Telephone: (650) 849-4840 9 Facsimile: (650) 849-4840 9 Facsimile: (650) 849-4840 9 Facsimile: (650) 849-4840 9 Facsimile: (650) 849-4602 10 Attorney for Defendant THE PERMANENTE MEDICAL GROUP 11 11 WILLIAM J. ROGERS, Esq. 19 Fourth Street, Suite 203 12 Petaluma, CA 94952 Tel:: 707-775-3090 14 Fax: 707-775-3098 Attorney for Plaintiff 15 ELLIOT EISENBERG 16 UNITED STATES DISTRICT COURT 17 NORTHERN DISTRICT OF CALIFORNIA 18 ELLIOT EISENBERG,	
2 Cody D. Knight (SBN 257627) 560 Mission Street, 31st Floor 3 San Francisco, California 94105 Telephone: (415) 397-2823 4 Facsimile: (415) 397-8549 Attorneys for Defendants 5 KAISER FOUNDATION HEALTH PLAN, INC., KAISER FOUNDATION HOSPITALS 6 BINGHAM MCCUTCHEN 7 Wendy M. Lazerson (SNB 97285) 1900 University Avenue, 4 th Floor 8 East Palo Also, CA 94303 Telephone: (650) 849-4840 9 Facsimile: (750) 849-4840 10 Facsimile: (750) 849-4840 <tr< td=""><td></td></tr<>	
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4 Facsimile: (415) 397-8549 Attorneys for Defendants 5 KAISER FOUNDATION HEALTH PLAN, INC., KAISER FOUNDATION HOSPITALS 6 BINGHAM MCCUTCHEN 7 Wendy M. Lazerson (SNB 97285) 1900 University Avenue, 4 th Floor 8 East Palo Also, CA 94303 Telephone: (650) 849-4840 9 Facsimile: (650) 849-4602 10 Attorney for Defendant THE PERMANENTE MEDICAL GROUP 11 WILLIAM J. ROGERS, Esq. 19 Fourth Street, Suite 203 12 I9 Fourth Street, Suite 203 13 Petaluma, CA 94952 Tel.: 707-775-3090 14 Fax: 707-775-3098 Attorney for Plaintiff 15 ELLIOT EISENBERG 16 UNITED STATES DISTRICT COURT 17 NORTHERN DISTRICT OF CALIFORNIA 18 ELLIOT EISENBERG, Case No. CV 10-3208 PJH 19 Plaintiff, JoINT STIPULATION AND 19 Plaintiff, JOINT STIPULATION AND 19 Plaintiff, JOINT STIPULATION AND 10 IPROPOSEDJ ORDER REGAR 11 HE PERMANENTE MEDICAL GROUP; JOISCLOSURES AND EXPERT	
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7 BINGHAM MCCUTCHEN Wendy M. Lazerson (SNB 97285) 1900 University Avenue, 4 th Floor East Palo Also, CA 94303 Telephone: (650) 849-4840 9 9 Facsimile: (650) 849-4840 9 Facsimile: (650) 849-4602 10 Attorney for Defendant THE PERMANENTE MEDICAL GROUP 11 WILLIAM J. ROGERS, Esq. 19 Fourth Street, Suite 203 13 Petaluma, CA 94952 Tel.: 707-775-3090 14 Fax: 707-775-3098 Attorney for Plaintiff 15 ELLIOT EISENBERG 16 UNITED STATES DISTRICT COURT 17 NORTHERN DISTRICT OF CALIFORNIA 18 ELLIOT EISENBERG, Case No. CV 10-3208 PJH 19 Plaintiff,) 19 Plaintiff,) 20 v.) EXTENSION OF DATES FOR 20 v.) EXTENSION OF DATES FOR 21 THE PERMANENTE MEDICAL GROUP;) DISCLOSURES AND EXPERT	
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 17 NORTHERN DISTRICT OF CALIFORNIA 18 ELLIOT EISENBERG, 19 Plaintiff, 20 V. 21 THE PERMANENTE MEDICAL GROUP; 21 DISTRICT COURT 21 DISTRICT OF CALIFORNIA 22 DISTRICT OF CALIFORNIA 23 DISTRICT OF CALIFORNIA 24 DISTRICT OF CALIFORNIA 25 DISTRICT OF CALIFORNIA 26 DISTRICT OF CALIFORNIA 27 DISTRICT OF CALIFORNIA 28 DISTRICT OF CALIFORNIA 29 DISTRICT OF CALIFORNIA 20 DISTRICT OF CALIFORNIA 20 DISTRICT OF CALIFORNIA 21 DISTRICT OF CALIFORNIA 22 DISTRICT OF CALIFORNIA 23 DISTRICT OF CALIFORNIA 24 DISTRICT OF CALIFORNIA 24 DISTRICT OF CALIFORNIA 25 DISTRICT OF CALIFORNIA 26 DISTRICT OF CALIFORNIA 27 DISTRICT OF CALIFORNIA 28 DISTRICT OF CALIFORNIA 29 DISTRICT OF CALIFORNIA 20 DISTRICT OF CALIFORNIA 20 DISTRICT OF CALIFORNIA 21 DISTRICT OF CALIFORNIA 21 DISTRICT OF CALIFORNIA 21 DISTRICT OF CALIFORNIA 22 DISTRICT OF CALIFORNIA 23 DISTRICT OF CALIFORNIA 24 DISTRICT OF CALIFORNIA 24 DISTRICT OF CALIFORNIA 25 DISTRICT OF CALIFORNIA 26 DISTRICT OF CALIFORNIA 27 DISTRICT OF CALIFORNIA 28 DISTRICT OF CALIFORNIA 29 DISTRICT OF CALIFORNIA 20 DISTRICT OF CALIFORNIA 20 DISTRICT OF CALIFORNIA 20 DISTRICT OF CALIFORNIA 20 DI	
18 ELLIOT EISENBERG,) Case No. CV 10-3208 PJH 19 Plaintiff,) 20 v.) 11 Plaintiff,) 20 v.) 11 THE PERMANENTE MEDICAL GROUP;) 21 DISCLOSURES AND EXPERT	
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20 v. THE PERMANENTE MEDICAL GROUP;) JOINT STITULATION AND EXTENSION OF DATES FOR DISCLOSURES AND EXPERT	
20 v. 21 V. 21 THE PERMANENTE MEDICAL GROUP; 21 DISCLOSURES AND EXPERT	DING
	EXPERT
22 INC.; KAISER FOUNDATION HOSPITALS;) DOES 1-10, inclusive,	
23 Defendants.	
24 Jerendants.)	
25	
26	
27	
28 1 JOINT STIPULATION AND[PROPOSED] ORDER REGARDING EXTENSION	
OF EXPERT DISCOVERY DATES /Case No. CV 10-3208 PJH	1
De	

1	Pursuant to Northern District Local Rules 6-1(b) and 6-2, Plaintiff Dr. Elliot Eisenberg
2	and Defendants The Permanente Medical Group, Kaiser Foundation Health Plan, Inc. and Kaiser
3	Foundation Hospitals, by and through their attorneys of record, have met and conferred
4	regarding an extension of the date for expert disclosures and expert discovery .
5	Good cause exists for the extensions set forth below for the following reasons:
6	1. The Court previously continued the date for the hearing on Defendants' summary
7	judgment motions from October 12, 2011 to December 14, 2011 pursuant to stipulation of the
8	parties at the request of Plaintiff's counsel. As a result, a ruling on the summary judgment
9	motions is not anticipated until December 14, 2011 at the earliest.
10	2. Any expert selections and disclosures will necessarily depend on which claims, if
11	any, remain after the Court's ruling on the summary judgment motion. Without this
12	continuance, the parties risk expending significant time, effort, and cost in identifying and
13	retaining experts that are ultimately unnecessary for trial in advance of the disclosure date.
14	3. The proposed changes to the discovery and dispositive motion plan do not alter
15	the February 27, 2011 trial date. The parties agree that these changes will not be raised as a basis
16	for any subsequent request for a trial continuance.
17	IT IS HEREBY STIPULATED BY THE PARTIES that the following changes shall be
18	made to the discovery deadline dates:
19	1.Expert Witness Disclosures:December 30, 2011
20	2. Deposition of Experts: February 10, 2012
21	The above changes to the parties' discovery plan do not alter the February 27, 2012 trial
22	date and the parties agree that these changes will not be raised as a basis for any subsequent
23	request for a trial continuance.
24	
25	
26	
27	
28	2 JOINT STIPULATION AND [PROPOSED] ORDER REGARDING
	EXTENSION OF EXPERT DISCOVERY DATES/ Case No. CV 10-3208 PJH

1	DATED: October 18, 2011	SEYFARTH SHAW LLP
2		
3		By /s/ Cody D. Knight Kari Erickson Levine
4		Cody D. Knight
5		Attorneys for Defendants KAISER FOUNDATION HEALTH PLAN, INC. and KAISER FOUNDATION HOSPITALS
6		and KAISER FOUNDATION HOSE HAES
7	DATED: October 18, 2011	BINGHAM MCCUTCHEN
8		
9		By Attorneys for Defendant
10		THE PERMANENTE MEDICAL GROUP
11	DATED: October 18, 2011	LAW OFFICE OF WILLIAM J. ROGERS, ESQ.
12		
13		By William J. Rogers, Esq.
14		Attorney for Plaintiff DR. ELLIOT EISENBERG
15		DR. ELEIOT EISENDERO
16		
17		IGHT IN SUPPORT OF STIPULATION TO COVERY & DISCLOSURE DATES
18		
19	I, Cody D. Knight, declare:	
20	1. I am an attorney at law licen	sed to practice in the State of California, and I am a
21	managing associate with the law firm Seyfa	arth Shaw LLP, counsel for KFH and KFHP. I make
22	this declaration based on my own personal	knowledge, and if called as a witness, I could and
23	would testify to the facts set forth herein.	
24	2. No previous continuance of	the expert witness disclosure or expert witness cutoff
25	dates in this case have been requested. At r	request of Plaintiff's counsel, the parties previously
26	stipulated, and the Court ordered, a continu	ance of the opposition and reply briefing schedule
27	and the hearing date on Defendants' motion	ns for summary judgment from October 12, 2011 to
28	IOINT STIPLILATION AN	3 D [PROPOSED] ORDER REGARDING
		COVERY DATES/ Case No. CV 10-3208 PJH

		~
1	DATED: October 18, 2011	SEYFARTH SHAW LLP
2	-	
3		By
4		Kari Erickson Levine Cody D. Knight
5	á -	Attorneys for Defendants KAISER FOUNDATION HEALTH PLAN, INC.
6		and KAISER FOUNDATION HOSPITALS
7	DATED: October 18, 2011	BINGHAM MCCUTCHEN
8		Columb - 14 Mr. A.
9		By Mining deforthull
10		Wendy M. Lazerson Christine de Bretteville
11		Attorneys for Defendant THE PERMANENTE MEDICAL GROUP
12	DATED: October 18, 2011	LAW OFFICE OF WILLIAM J. ROGERS, ESQ.
13		
14		By
15		William J. Rogers, Esq. Attorney for Plaintiff
16		DR. ELLIOT EISENBERG
17		
18	DECLARATION OF CODY D. KNI	GHT IN SUPPORT OF STIPULATION TO
19	<u>CONTINUE EXPERT DISC</u>	COVERY & DISCLOSURE DATES
20	I, Cody D. Knight, declare:	
21	1. I am an attorney at law licens	ed to practice in the State of California, and I am a
22	managing associate with the law firm Seyfar	th Shaw LLP, counsel for KFH and KFHP. I make
23	this declaration based on my own personal k	nowledge, and if called as a witness, I could and
24	would testify to the facts set forth herein.	
25	2. No previous continuance of the	he expert witness disclosure or expert witness cutoff
26	dates in this case have been requested. At re	equest of Plaintiff's counsel, the parties previously
27	stipulated, and the Court ordered, a continua	nce of the opposition and reply briefing schedule
28		3
		P [PROPOSED] ORDER REGARDING OVERY DATES/ Case No. CV 10-3208 PJH

11	04:16p	Will Rogers,Esq.	707 7753098	p.4
1	DATED:	October 18, 2011	SEYFARTH SHAW LLP	
2				
3 4			By Kari Erickson Levine	
4			Cody D. Knight Attorneys for Defendants KAISER FOUNDATION HEALTH PLAN, INC and KAISER FOUNDATION HOSPITALS	~
5			and KAISER FOUNDATION HEALTH PLAN, INC	
7	DATED:	October 18, 2011	BINGHAM MCCUTCHEN	
8				
9			By	-
10			Attorneys for Defendant THE PERMANENTE MEDICAL GROUP	
11	DATED:	October 18, 2011	LAW OFFICE OF WILLIAM J. ROGERS, ESC	 2.
12			100/1	
13			By William J. Rogers, Esq.	
14			Attorney for Plaintiff DR. ELLIOT EISENBERG	
15			DK. ELLIOT EISENBERG	
16				
17	DEC		UGHT IN SUPPORT OF STIPULATION TO COVERY & DISCLOSURE DATES	
18		CONTINUE EXTERT DA	COVERT & DISCHOSCRE DATES	
19	I, 9	Cody D. Knight, declare:		
20	1.	I am an attorney at law licen	sed to practice in the State of California, and I am	a
21	managing	associate with the law firm Seyfa	arth Shaw LLP, counsel for KFH and KFHP. I ma	ıke
22	this declar	ration based on my own personal	knowledge, and if called as a witness, I could and	
23	would tes	tify to the facts set forth herein.		
24	2.	No previous continuance of	the expert witness disclosure or expert witness cur	toff
25	dates in th	nis case have been requested. At n	request of Plaintiff's counsel, the parties previousl	у
26	stipulated	, and the Court ordered, a continu	ance of the opposition and reply briefing schedule	,
27	and the he	varing date on Defendants' motion	ns for summary judgment from October 12, 2011 t	0
28		ו ועד אדוסוין אדיסאי אא	3 D [PROPOSED] ORDER REGARDING	
			COVERY DATES/ Case No. CV 10-3208 PJH	l

1	December 14, 2011.

3. As a result of the continuance of the summary judgment hearing date, a ruling on
the summary judgment motions is not anticipated until December 14, 2011 at the earliest. Any
expert selections and disclosures will necessarily depend on which claims, if any, remain after
the Court's ruling on the summary judgment motion. Without this continuance, the parties risk
expending significant time, effort, and cost in identifying and retaining experts that are
ultimately unnecessary for trial in advance of the disclosure date.
4. The granting of this requested continuance of the expert disclosure and discovery
deadlines is not anticipated to have any other effect on the overall scheduling of the case. The
trial date can be maintained for February 27, 2012 as currently scheduled.
I declare under the penalty of perjury of the laws of the United States of America and the
State of California that the foregoing is true and correct.
Executed on October 18, 2011 at San Francisco, California.
/s/ Cody D. Knight Cody D. Knight
[PROPOSED] ORDER
The Stipulation of the parties adopting changes to the expert disclosure cutoff and expert
deposition cutoff is hereby accepted by the Court and the parties are ordered to comply with this
Order.
ATES DISTRICT
IT IS SO ORDERED.
E DEBED E
DATED: 10/25/11 EN IT IS SO ORDERED
Honorable United Sta
United Sta Z Judge Phyllis J. Hamilton
DISTRICT OF CT
4 JOINT STIPULATION AND [PROPOSED] ORDER REGARDING 13848097v.1 / 23851-050758ENSION OF EXPERT DISCOVERY DATES/ Case No. CV 10-3208 PJH