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8 Attorneys for Federal Cross-Defendants
 West County Health Centers, Inc., Trina Bowen, M.D.
 9 and United States of America

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 OAKLAND DIVISION

13 JASPER GONZALES, by his Guardian Ad
 Litem, JENNA GONZALES,

Civil Action No. C11-4319 LB

14 Plaintiffs,

15 v.

16 RICK SIMONS, FURTADO, JASPOVICE
 17 & SIMONS, a law corporation, SUTTER
 BAY HOSPITALS dba SUTTER
 18 MEDICAL CENTER OF SANTA ROSA,
 and DOES 1 through 20,

19 Defendants.

20 SUTTER BAY HOSPITALS dba SUTTER
 21 MEDICAL CENTER OF SANTA ROSA,

22 Cross-Complainant,

23 v.

24 TRINA BOWEN, M.D., WEST COUNTY
 25 HEALTH CENTERS, INC., and ROES 1-
 10,

26 Cross-Defendants.

**STIPULATION AND ~~PROPOSED~~
 ORDER EXTENDING FEDERAL
 CROSS-DEFENDANTS' TIME TO
 RESPOND TO CROSS-COMPLAINT**

27
 28 STIP. & ~~PROPOSED~~ ORDER EXTENDING FED. CROSS-DEF'S TIME TO RESPOND
 TO CROSS-COMPL.

1 Defendant/cross-complainant Sutter Bay Hospitals dba Sutter Medical Center of Santa
2 Rosa (hereinafter, "Sutter" or "defendant/cross-complainant") and the federal cross-defendants
3 Trina Bowen, M.D. and West County Health Centers, Inc., by and through their counsel of
4 record, hereby stipulate and agree as follows:

5 1. Plaintiff Jasper Gonzales, a minor, by and through his guardian ad litem, Jenna
6 Gonzales, (hereinafter, "plaintiffs") filed a complaint against defendant Rick Simons and the law
7 firm of Furtado, Jaspovice & Simons in the Superior Court of California, County of Sonoma, on
8 or about December 21, 2010.

9 2. On or about February 2, 2011, plaintiffs filed a first amended complaint, adding Sutter
10 as a defendant.

11 3. On or about June 17, 2011, Sutter filed cross-complaint against Trina Bowen, M.D.,
12 and West County Health Centers, Inc. (hereinafter, "federal cross-defendants").

13 4. On or about August 16, 2011, the United States Attorney's Office received notification
14 from the United States Department of Health and Human Services about this pending lawsuit,
15 and the federal cross-defendants filed a notice of removal on August 31, 2011.

16 5. To allow the federal cross-defendants sufficient to respond to the cross-complaint,
17 defendant/cross-complainant Sutter and federal cross-defendants stipulate and agree to extend the
18 federal cross-defendants' time to respond to the cross-complaint in the above-captioned case by
19 30 days, until October 7, 2011.

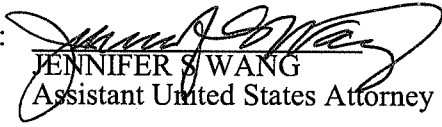
20 IT IS SO STIPULATED.

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22 DATED: September 7, 2011

Respectfully submitted,

MELINDA HAAG
United States Attorney

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25 By:


JENNIFER S. WANG
Assistant United States Attorney

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28 STIP. & ~~PROPOSED~~ ORDER EXTENDING FED. CROSS-DEF'S TIME TO RESPOND
TO CROSS-COMPL.

C11-4319 LB

1 DATED: September 7, 2011

2 By:



3 TROY VAHIDI
4 LA FOLLETTE, JOHNSON, DE HAAS,
5 FESLER & AMES
6 Attorneys for Defendant and Cross-Complainant
7 Sutter Bay Hospitals dba Sutter Medical Center of
8 Santa Rosa

9 ~~PROPOSED~~ ORDER

10 Pursuant to stipulation, and good cause having been shown, it is ordered that the federal cross-
11 defendants' deadline to respond to defendant/cross-complainant's cross-complaint in the above-
12 captioned matter is extended to October 7, 2011.

13 IT IS SO ORDERED.

14 Dated: September 9, 2011



15 LAUREL BEELER
16 UNITED STATES MAGISTRATE JUDGE

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STIP. & ~~PROPOSED~~ ORDER EXTENDING FED. CROSS-DEF'S TIME TO RESPOND
TO CROSS-COMPL.

C11-4319 LB