

1 JOHN L. BURRIS ESQ., SBN 69888  
 2 BENJAMIN NISENBAUM, ESQ., SBN 222173  
 3 JAMES COOK, ESQ., SBN 300212  
 4 **LAW OFFICES OF JOHN L. BURRIS**  
 5 Airport Corporate Centre  
 6 7677 Oakport Street, Suite 1120  
 7 Oakland, California 94621  
 8 Telephone: (510) 839-5200  
 9 Facsimile: (510) 839-3882

Attorneys for Plaintiffs

8 **UNITED STATES DISTRICT COURT**  
 9  
 10 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

11 TANTI MARTINEZ, individually; Minor M.M.,  
 12 by and through his Guardian Ad Litem Corrina  
 13 Mendoza; Minor T.M., by and through her  
 14 Guardian Ad Litem Corrina Mendoza; Minor  
 15 I.M., by and through his mother and Guardian  
 16 Ad Litem, Vanessa Hernandez,

CASE NO.: 3:16-cv-00881 JSW

**STIPULATION TO EXTEND DEADLINE  
 TO AMEND PLEADINGS AND ORDER**

Plaintiffs,

vs.

18 CORIZON HEALTH, INC., a Delaware  
 19 Corporation; HAROLD ORR, M.D.; TEHMINA  
 20 KANWAL, M.D.; COUNTY OF ALAMEDA, a  
 21 municipal corporation; SHERIFF GREGORY J.  
 22 AHERN, in his individual and official capacities;  
 23 and DOES 1-50, inclusive,  
 24 Defendants.

**STIPULATION**

26 1. WHEREAS, the deadline to Amend Pleadings in this action is currently set for  
 27 September 16, 2016 (as reflected in Docket Entry No. 20, pertaining to Case Management  
 28 Conference held on June 3, 2016).

1 2. WHEREAS, the parties have diligently pursued discovery. Specifically, Plaintiffs  
2 propounded written discovery on Defendants CORIZON HEALTH, INC. and COUNTY OF  
3 ALAMEDA on June 24, 2016, making their responses due July 25, 2016.

4 3. WHEREAS, Defendants have requested a two-week extension to respond to the  
5 written discovery propounded on them, making their responses due by August 8, 2016.

6 4. WHEREAS, Plaintiffs' counsel is currently scheduled for a two week trial starting on  
7 August 22, 2016 before Judge Breyer in Sheehan v. City and County of San Francisco, et al. Case  
8 No. C 09-03889 CRB.

9 5. WHEREAS, Plaintiffs anticipate the discovery responses from Defendants COUNTY  
10 and CORIZON HEALTH, INC. to be voluminous and require substantial time to review.

11 6. WHEREAS, thorough review of said discovery responses is necessary to determine  
12 the identities and roles of unnamed Defendant DOES, in order to prepare an Amended Pleading that  
13 properly identifies all unnamed Defendant DOES.  
14

15 7. WHEREFORE, the parties stipulate and respectfully request a two-week extension of  
16 the deadline to Amend Pleadings, from September 16, 2016, to September 30, 2016.

17 IT IS SO STIPULATED.

18  
19 **LAW OFFICES OF JOHN L. BURRIS**

20  
21 Dated: July 25, 2016

/s/ Ben Nisenbaum  
Ben Nisenbaum,  
Attorney for Plaintiffs

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24 **THE LAW OFFICES OF NANCY E. HUDGINS**

25  
26 Dated: July 25, 2016


/s/ Matthew M. Grigg  
Matthew M. Grigg  
Attorney for Defendants

**ORDER**

**GOOD CAUSE SHOWN**, the Court hereby grants the parties' Stipulation to extend the Deadline to Amend Pleadings by two weeks. Pursuant to this Order, the Last Day to Amend Pleadings is **September 30, 2016**.

**IT IS SO ORDERED.**

Dated: July 28, 2016

  
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Hon. Jeffrey S. White  
UNITED STATES DISTRICT COURT

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