

1 DOWNEY BRAND LLP  
 2 ELIZABETH B. STALLARD (Bar No. 221445)  
 3 621 Capitol Mall, 18th Floor  
 4 Sacramento, CA 95814-4731  
 Telephone: 916.444.1000  
 Facsimile: 916.444.2100  
 estallard@downeybrand.com

5 Attorneys for Defendants  
 6 DIGNITY HEALTH dba ST. MARY'S MEDICAL  
 7 CENTER aka ST. MARY'S HOSPITAL, DIGNITY  
 8 HEALTH FOUNDATION

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

DOWNEY BRAND LLP

12 CHRISTOPHER SELDON,  
 13 Plaintiff,

14 v.

15 DIGNITY HEALTH, a California  
 16 Corporation dba ST. MARY'S MEDICAL  
 17 CENTER aka ST. MARY'S HOSPITAL,  
 18 DIGNITY HEALTH FOUNDATION and  
 DOES 1-20, INCLUSIVE,  
 19 Defendants.

Case No. 4:16-CV-02454-KAW

**STIPULATED REQUEST FOR ORDER  
 CHANGING CERTAIN DEADLINES IN  
 SCHEDULING ORDER; DECLARATION  
 OF ELIZABETH B. STALLARD;  
 [PROPOSED] ORDER**

20 Pursuant to U.S. District Court, Northern District of California, Local Rules 6-1(b), 6-2,  
 21 and 7-12, Defendants DIGNITY HEALTH dba ST. MARY'S MEDICAL CENTER and  
 22 DIGNITY HEALTH FOUNDATION ("Defendants") and Plaintiff CHRISTOPHER SELDON  
 23 ("Plaintiff") (collectively referred to as "Parties") enter this stipulated request for an extension of  
 24 the deadline for completing a joint inspection of the premises, and the deadline for the Parties to  
 25 complete initial disclosures, contained in the Scheduling Order, entered by this Court on May 5,  
 26 2016, by twenty (20) days.

27 As explained in the accompanying Declaration of Elizabeth B. Stallard, due to certain  
 28 scheduling conflicts, along with Parties disagreement as to the potential impact of the Consent



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**DECLARATION OF ELIZABETH B. STALLARD**

1. I am an attorney licensed to practice law in the State of California and am attorney for Defendants DIGNITY HEALTH dba ST. MARY’S MEDICAL CENTER and DIGNITY HEALTH FOUNDATION in the above-referenced action.

2. I make this declaration in support of the Parties’ Stipulated Request for Order Changing Certain Deadlines in the Scheduling Order.

3. I am currently out of the country on a vacation with my family and I will not return to the office until August 15, 2016. Given that the deadline for conducting the inspection is currently set at August, 18, 2016, the Parties need more time to meet and confer with respect to the scope and details of the joint inspection.

4. The Parties also need additional time to meet and confer regarding the scope of the joint inspection, given the planned remediation scheduled to take place pursuant to the Consent Decree in the *Kemper* case. Plaintiff disagrees that the *Kemper* case has any effect and the Parties intend to meet and confer regarding this disagreement.

5. The Parties agree that no further alterations will be completed to the relevant premises at issue in this matter for a period of thirty (30) days from the filing of this joint request.

6. The Parties have not previously requested any extensions of deadlines in this case.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 11 day of August 2016.

\_\_\_\_\_  
/s/ Elizabeth E. Stallard  
ELIZABETH B. STALLARD

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 8/12/16

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*Kandis Westmore*  
HON. KANDIS A. WESTMORE  
UNITED STATES DISTRICT COURT