

1 CHARLES L. THOMPSON, IV, State Bar No. 139927  
 charles.thompson@ogletreedeakins.com  
 2 ROSHNI CHAUDHARI, State Bar No. 310612  
 roshni.chaudhari@ogletreedeakins.com  
 3 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
 Steuart Tower, Suite 1300  
 4 One Market Plaza  
 San Francisco, CA 94105  
 5 Telephone: 415.442.4810  
 Facsimile: 415.442.4870  
 6

7 Attorneys for Defendants  
 ST. JOSEPH HEALTH, SANTA ROSA MEMORIAL HOSPITAL,  
 and ANGELA DANVERS  
 8

9 **UNITED STATES DISTRICT COURT**  
 10 **NORTHERN DISTRICT OF CALIFORNIA**  
 11

12 KACIE HINCHCLIFF,  
 13 Plaintiff,  
 14 v.  
 15 ST. JOSEPH HEALTH; SANTA ROSA  
 MEMORIAL HOSPITAL; ANGELA  
 16 DANVERS; and DOES 1-50,  
 17 Defendants.  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25  
 26  
 27  
 28

Case No. 4:16-cv-03892-HSG  
**JOINT STIPULATION AND ORDER TO  
 EXTEND DEADLINE TO COMPLETE  
 MEDIATION**  
 Complaint Filed: April 19, 2016  
 Trial Date: November 13, 2017

1 WHEREAS, Plaintiff Kacie Hinchcliff filed this action on April 19, 2016 in Sonoma  
2 County Superior Court and Defendants St. Joseph Health, Santa Rosa Memorial Hospital, and  
3 Angela Danvers subsequently removed the matter to this Court on July 13, 2016;

4 WHEREAS on December 16, 2016, the Court ordered the parties to complete court-  
5 connected mediation within 90 days;

6 WHEREAS on January 11, 2017, the Court appointed Martin H. Dodd as Mediator;

7 WHEREAS the current deadline to engage in mediation in this case is March 16, 2017;

8 WHEREAS the parties initially planned to depose Plaintiff and then mediate in March  
9 2017;

10 WHEREAS the parties have agreed to take Plaintiff's deposition and mediate at a later  
11 mutually agreeable date due to ongoing discovery necessary for meaningful mediation and the  
12 parties' respective schedules including trial schedules; and

13 NOW, THEREFORE, the parties, by and through their counsel of record, hereby stipulate  
14 and agree to extend the mediation completion date from March 16, 2017 to June 2, 2017.

15 IT IS SO STIPULATED.

16 DATED: March 16, 2017

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

17  
18 By: /s/ Roshni Chaudhari

19 CHARLES L. THOMPSON, IV  
20 ROSHNI CHAUDHARI

21 Attorneys for Defendant  
22 ST. JOSEPH HEALTH; SANTA ROSA  
23 MEMORIAL HOSPITAL; ANGELA  
24 DANVERS  
25  
26  
27  
28

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

DATED: March 16, 2017

KORNBLUM, COCHRAN, ERICKSON &  
HARBISON, LLP

By: /s/ Charles D. Cochran  
CHARLES D. COCHRAN  
AMY S. WINTERS  
  
Attorneys for Plaintiff  
KACIE HINCHCLIFF

**SIGNATURE ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatories.

DATED: March 16, 2017

By: /s/ Roshni Chaudhari  
ROSHNI CHAUDHARI

**ORDER**

Having read the parties' stipulation, and finding good cause therefor, the Court hereby ORDERS that the deadline to complete court-connected mediation is extended from March 16, 2017 to June 2, 2017.

IT IS SO ORDERED.

Dated: March 17, 2017

  
HON. HAYWOOD S. GILLIAM, JR.  
United States District Court Judge

29106813.1