| David C. Kiernan (State Bar No. 215335) dkiernan@JonesDay.com David L. Wallach (State Bar No. 233432) dwallach@JonesDay.com Abigai Johnson (State Bar No. 294243) ajohnson@JonesDay.com JONES DAY 555 California Street, 26th Floor San Francisco, CA. 94104 Telephone: 415.626.3939 Facsimile: 415.875.5700 Attorneys for Plaintiff GREGORY N. STESHENKO UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION GREGORY N. STESHENKO, Plaintiff, v. THOMAS MCKAY, DOROTHY NUNN, and ANNE LUCERO of the Cabrillo Community College District CABRILLO COMMUNITY COLLEGE DISTRICT; KRISTINE SCOPAZIJ BERTHALUPE CARRILLO, and SALLY NEWELL of WATSONVILLE COMMUNITY HOSPITAL, WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); 23 WHEREAS, trial is currently set for June Myer Scheduled For June 11 and a meet and confer regarding trial preparation to take place no later than May 20; WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order Case No. 09-cv-05543 Supulation and [Proposed] Order Case No. 09-cv-05543 | | | |
|--|---|---|--|
| David L. Wallach (State Bar No. 233432) dwallach (9 Jones Day.com Abigail Johnson (State Bar No. 294243) ajohnson (9 Jones Day.com JONES DAY 535 California Street, 26th Floor San Francisco, CA 94104 Telephone: 415.626.3939 Facsimile: 415.875.5700 Attorneys for Plaintiff GREGORY N. STESHENKO UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION GREGORY N. STESHENKO, Plaintiff, v. THOMAS MCKAY, DOROTHY NUNN, and ANNE LUCERO of the Cabrillo Community College District; CABRILLO COMMUNITY COLLEGE DISTRICT; KRISTINE SCOPAZZI, BERTHALUPE CARRILLO, and SALLY NEWELL of Watsonville Community Hollege District; CABRILLO COMMUNITY COLLEGE DISTRICT; KRISTINE SCOPAZZI, BERTHALUPE CARRILLO, and SALLY NEWELL of Watsonville Community Hollege District; CABRILLO dwartsonville Community Hollege District; Carrier Haller WATSONVILLE COMMUNITY HOSPITAL, Defendants. WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); 23, WHEREAS, trial is currently set for June 24, 2014 with a pretrial conference scheduled for June 11 and a meet and confer regarding trial preparation to take place no later than May 20; WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 1 | | |
| Abigail Johnson (State Bar No. 294243) ajohnson@JonesDay.com JONES DAY 555 California Street. 26th Floor San Francisco, CA 94104 Telephone: 415.626.3939 Facsimile: 415.875.5700 Attorneys for Plaintiff GREGORY N. STESHENKO UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION GREGORY N. STESHENKO, Plaintiff, v. THOMAS MCKAY, DOROTHY NUNN, and ANNE LUCERO of the Cabrillo COMMUNITY COLLEGE DISTRICT; KRISTINE SCOPAZZI, BERTHALUPE CARRILLO, and SALLY NEWELL of Watsonville Community Hospital; WATSONVILLE COMMUNITY Defendants. WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); 23, WHEREAS, trial is currently set for June WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 2 | David L. Wallach (State Bar No. 233432) | |
| JONES DAY 555 California Street, 26th Floor San Francisco, CA 94104 Telephone: 415.626.3939 Facsimile: 415.875.5700 Attorneys for Plaintiff GREGORY N. STESHENKO UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION GREGORY N. STESHENKO, Plaintiff, v. THOMAS MCKAY, DOROTHY NUNN, and ANNE LUCERO of the Cabrillo Community College District; CABRILLO COMMUNITY COLLEGE DISTRICT; KRISTINE SCOPAZI, BERTHALUPE CARRILLO, and SALLY NEWELL of Watsonville Community Hospital; WATSONVILLE COMMUNITY HOSPITAL, WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); WHEREAS, trial is currently set for June WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 3 | Abigail Johnson (State Bar No. 294243) | |
| San Francisco, CA 94104 Telephone: 415.875.5700 Attorneys for Plaintiff GREGORY N. STESHENKO UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION GREGORY N. STESHENKO, Plaintiff, v. THOMAS MCKAY, DOROTHY NUNN, and ANNE LUCERO of the Cabrillo Community College District; CABRILLO COMMUNITY COLLEGE DISTRICT; KRISTINE SCOPAZI, BERTHALUPE CARRILLO, and SALLY NEWELL of Watsonville Community Hospital; WATSONVILLE COMMUNITY HOSPITAL, WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); WHEREAS, trial is currently set for June WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 4 | JONES DAY | |
| Attorneys for Plaintiff GREGORY N. STESHENKO UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION GREGORY N. STESHENKO, Plaintiff, v. THOMAS MCKAY, DOROTHY NUNN, and ANNE LUCERO of the Cabrillo Community College District; CABRILLO COMMUNITY COLLEGE DISTRICT; KRISTINE SCOPAZZI, BERTHALUPE CARRILLO, and SALLY NEWELL of WATSONVILLE COMMUNITY BERTHALUPE WATSONVILLE COMMUNITY WHOSPITAL, WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); WHEREAS, trial is currently set for June WHEREAS, trial is currently set for June WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 5 | San Francisco, CA 94104 | |
| GREGÓRY N. STESHENKO UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION GREGORY N. STESHENKO, Plaintiff, v. THOMAS MCKAY, DOROTHY NUNN, and ANNE LUCERO of the Cabrillo Community College District; CABRILLO COMMUNITY COLLEGE DISTRICT; KRISTINE SCOPAZZI, BERTHALUPE CARRILLO, and SALLY NEWELL of Watsonville Community Hospital; WATSONVILLE COMMUNITY HOSPITAL, WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); WHEREAS, trial is currently set for June WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 6 | | |
| UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION GREGORY N. STESHENKO, Plaintiff, v. STIPULATION AND [PROPOSED] ORDER SHORTENING BREFFING SCHEDULE FOR PLAINTIFF'S MOTION TO REOPEN DISCOVERY MOTION TO REOPEN DISCOVERY WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); WHEREAS, trial is currently set for June \$\frac{3}{2}\$, WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; What so will be supported by the proposed of the capture of th | 7 | Attorneys for Plaintiff | |
| NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION GREGORY N. STESHENKO, Plaintiff, v. STIPULATION AND [PROPOSED] ORDER SHORTENING BRIEFING SCHEDULE FOR PLAINTIFF'S MOTION TO REOPEN DISCOVERY MOTION TO REOPEN DISCOVERY WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); WHEREAS, trial is currently set for June 11 and a meet and confer regarding trial preparation to take place no later than May 20; WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 8 | GREGURY N. STESHENKU | |
| GREGORY N. STESHENKO, Plaintiff, v. THOMAS MCKAY, DOROTHY NUNN, and ANNE LUCERO of the Cabrillo Community College District; CABRILLO COMMUNITY COLLEGE DISTRICT; KRISTINE SCOPAZZI, BERTHALUPE CARRILLO, and SALLY NEWELL of Watsonville Community Hospital; WATSONVILLE COMMUNITY HOSPITAL, Defendants. WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); WHEREAS, trial is currently set for June 11 and a meet and confer regarding trial preparation to take place no later than May 20; WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 9 | UNITED STATES DISTRICT COURT | |
| GREGORY N. STESHENKO, Plaintiff, v. THOMAS MCKAY, DOROTHY NUNN, and ANNE LUCERO of the Cabrillo Community College District; CABRILLO COMMUNITY COLLEGE DISTRICT; KRISTINE SCOPAZZI, BERTHALUPE CARRILLO, and SALLY NEWELL of Watsonville Community Hospital; WATSONVILLE COMMUNITY HOSPITAL, WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); WHEREAS, trial is currently set for June 1, 2014 with a pretrial conference scheduled for June 11 and a meet and confer regarding trial preparation to take place no later than May 20; WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 10 | NORTHERN DISTRICT OF CALIFORNIA | |
| GREGORY N. STESHENKO, Plaintiff, v. STIPULATION AND [PROPOSED] ORDER SHORTENING BRIEFING SCHEDULE FOR PLAINTIFF'S MOTION TO REOPEN DISCOVERY STIPULATION AND [PROPOSED] ORDER SHORTENING BRIEFING SCHEDULE FOR PLAINTIFF'S MOTION TO REOPEN DISCOVERY WATSONVILLE COMMUNITY HOSPITAL, WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); WHEREAS, trial is currently set for June 21, 2014 with a pretrial conference scheduled for June 11 and a meet and confer regarding trial preparation to take place no later than May 20; WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 11 | SAN JOSE DIVISION | |
| Plaintiff, v. THOMAS MCKAY, DOROTHY NUNN, and ANNE LUCERO of the Cabrillo Community College District; CABRILLO COMMUNITY COLLEGE DISTRICT; KRISTINE SCOPAZZI, BERTHALUPE CARRILLO, and SALLY NEWELL of Watsonville Community Hospital; WATSONVILLE COMMUNITY HOSPITAL, Defendants. WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); 23, WHEREAS, trial is currently set for June 21, 2014 with a pretrial conference scheduled for June 11 and a meet and confer regarding trial preparation to take place no later than May 20; WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 12 | | |
| THOMAS MCKAY, DOROTHY NUNN, and ANNE LUCERO of the Cabrillo Community College District; CABRILLO COMMUNITY COLLEGE DISTRICT; KRISTINE SCOPAZZI, BERTHALUPE CARRILLO, and SALLY NEWELL of Watsonville Community Hospital; WATSONVILLE COMMUNITY HOSPITAL, Defendants. WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); 23, WHEREAS, trial is currently set for June 21, 2014 with a pretrial conference scheduled for June 11 and a meet and confer regarding trial preparation to take place no later than May 20; WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 13 | GREGORY N. STESHENKO, | Case No. 09-cv-05543 RS |
| THOMAS MCKAY, DOROTHY NUNN, and ANNE LUCERO of the Cabrillo Community College District; CABRILLO COMMUNITY COLLEGE DISTRICT; KRISTINE SCOPAZZI, BERTHALUPE CARRILLO, and SALLY NEWELL of Watsonville Community Hospital; WATSONVILLE COMMUNITY HOSPITAL, WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); WHEREAS, trial is currently set for June 23, WHEREAS, trial is currently set for June 21, 2014 with a pretrial conference scheduled for June 11 and a meet and confer regarding trial preparation to take place no later than May 20; WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 14 | Plaintiff, | |
| THOMAS MCKAY, DOROTHY NUNN, and ANNE LUCERO of the Cabrillo Community College District; CABRILLO COMMUNITY COLLEGE DISTRICT; KRISTINE SCOPAZZI, BERTHALUPE CARRILLO, and SALLY NEWELL of Watsonville Community Hospital; WATSONVILLE COMMUNITY HOSPITAL, Defendants. WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); 23, WHEREAS, trial is currently set for June 1, 2014 with a pretrial conference scheduled for June 11 and a meet and confer regarding trial preparation to take place no later than May 20; WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 15 | v. | |
| COMMUNITY COLLEGE DISTRICT; KRISTINE SCOPAZZI, BERTHALUPE CARRILLO, and SALLY NEWELL of Watsonville Community Hospital; WATSONVILLE COMMUNITY HOSPITAL, Defendants. WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); 23, WHEREAS, trial is currently set for June 21, 2014 with a pretrial conference scheduled for June 11 and a meet and confer regarding trial preparation to take place no later than May 20; WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 16 | | SCHEDULE FOR PLAINTIFF'S |
| CARRILLO, and SALLY NEWELL of Watsonville Community Hospital; WATSONVILLE COMMUNITY HOSPITAL, Defendants. WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); 23, WHEREAS, trial is currently set for June 21, 2014 with a pretrial conference scheduled for June 11 and a meet and confer regarding trial preparation to take place no later than May 20; WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 17 | Community College District; CABRILLO COMMUNITY COLLEGE DISTRICT; | |
| Watsonville Community Hospital; WATSONVILLE COMMUNITY HOSPITAL, WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); 23, WHEREAS, trial is currently set for June 21, 2014 with a pretrial conference scheduled for June 11 and a meet and confer regarding trial preparation to take place no later than May 20; WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 18 | KRISTINE SCOPAZZI, BERTHALUPE CARRILLO, and SALLY NEWELL of | |
| Defendants. WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); WHEREAS, trial is currently set for June 21, 2014 with a pretrial conference scheduled for June 11 and a meet and confer regarding trial preparation to take place no later than May 20; WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 19 | Watsonville Community Hospital; | |
| WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); WHEREAS, trial is currently set for June 21, 2014 with a pretrial conference scheduled for June 11 and a meet and confer regarding trial preparation to take place no later than May 20; WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 20 | HOSPITAL | |
| WHEREAS, on April 22, 2014, Plaintiff Gregory N. Steshenko filed a motion to reopen discovery in the above-captioned case (the "Motion"); WHEREAS, trial is currently set for June 21, 2014 with a pretrial conference scheduled for June 11 and a meet and confer regarding trial preparation to take place no later than May 20; WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | ~ 4 | HOSHIAL, | |
| discovery in the above-captioned case (the "Motion"); 23, WHEREAS, trial is currently set for June 21, 2014 with a pretrial conference scheduled for June 11 and a meet and confer regarding trial preparation to take place no later than May 20; WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 21 | , | |
| WHEREAS, trial is currently set for June 21, 2014 with a pretrial conference scheduled for June 11 and a meet and confer regarding trial preparation to take place no later than May 20; WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | | Defendants. | |
| for June 11 and a meet and confer regarding trial preparation to take place no later than May 20; WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 22 | Defendants. WHEREAS, on April 22, 2014, Plaintiff | |
| WHEREAS, pursuant to Local Rule 7-2, the earliest Plaintiff's Motion could be heard is May 29; Stipulation and [Proposed] Order | 22 23 | Defendants. WHEREAS, on April 22, 2014, Plaintiff discovery in the above-captioned case (the "Mo | otion"); 23, |
| 28 May 29; Stipulation and [Proposed] Order | 222324 | Defendants. WHEREAS, on April 22, 2014, Plaintiff discovery in the above-captioned case (the "Mower WHEREAS, trial is currently set for June 1988). | otion"); 23, ne 21, 2014 with a pretrial conference scheduled |
| Stipulation and [Proposed] Order | 22232425 | Defendants. WHEREAS, on April 22, 2014, Plaintiff discovery in the above-captioned case (the "Mower WHEREAS, trial is currently set for June 11 and a meet and confer regarding trial" | otion"); 23, ne 21, 2014 with a pretrial conference scheduled al preparation to take place no later than May 20; |
| | 222324252627 | Defendants. WHEREAS, on April 22, 2014, Plaintiff discovery in the above-captioned case (the "Mowherea WHEREAS, trial is currently set for June 11 and a meet and confer regarding trial WHEREAS, pursuant to Local Rule 7-2 | otion"); 23, ne 21, 2014 with a pretrial conference scheduled al preparation to take place no later than May 20; |
| | 222324252627 | Defendants. WHEREAS, on April 22, 2014, Plaintiff discovery in the above-captioned case (the "Mowherea WHEREAS, trial is currently set for June 11 and a meet and confer regarding trial WHEREAS, pursuant to Local Rule 7-2 | otion"); 23, ne 21, 2014 with a pretrial conference scheduled all preparation to take place no later than May 20; t, the earliest Plaintiff's Motion could be heard is |

| 1 | WHEREAS, the parties have agreed to a shortened briefing schedule on Plaintiff's Motion | |
|----|--|--|
| 2 | so that it can be resolved prior to the aforementioned trial deadlines; | |
| 3 | IT IS HEREBY STIPULATED THAT Defendants will file their Opposition to Plaintiff's | |
| 4 | motion no later than April 29, 2014, and Plaintiff will file his Reply no later than May 2, 2014 | |
| 5 | after which the matter will be taken under submission on the papers. | |
| 6 | Dated: April 22, 2014 Lynch and Shupe, LLP | |
| 7 | | |
| 8 | By: /s/ John A. Shupe | |
| 9 | John A. Shupe | |
| 10 | Counsel for Defendants THOMAS MCKAY, DOROTHY NUNN, | |
| 11 | ANNE LUCERO, CABRILLO COMMUNITY COLLEGE DISTRICT | |
| 12 | | |
| 13 | | |
| 14 | Pursuant to Local Rule 5-1(i)(3), I, David L. Wallach, attest that concurrence in the filing | |
| 15 | of this document has been obtained from the other signatory. | |
| 16 | Dated: April 22, 2014 Jones Day | |
| 17 | | |
| 18 | By: /s/ David L. Wallach | |
| 19 | David L. Wallach | |
| 20 | Counsel for Plaintiff GREGORY N. STESHENKO | |
| 21 | | |
| 22 | PURSUANT TO THE FORGOING STIPULATION, IT IS SO ORDERED. | |
| 23 | | |
| 24 | Dated: 4/24/14 HONORABLE RICHARD SEEBORG | |
| 25 | United States District Court Judge | |
| 26 | | |
| 27 | | |
| 28 | | |