

FENWICK & WEST LLP
ATTORNEYS AT LAW
MOUNTAIN VIEW

1 LYNN H. PASAHOW (CSB No. 54283)
lpasahow@fenwick.com
2 DAVID K. TELLEKSON (Admitted *Pro Hac Vice*)
dtellekson@fenwick.com
3 MELANIE L. MAYER (Admitted *Pro Hac Vice*)
mmayer@fenwick.com
4 EWA M. DAVISON (Admitted *Pro Hac Vice*)
edavison@fenwick.com
5 DAVID J. AUSTIN (CSB No. 287645)
daustin@fenwick.com
6 FENWICK & WEST LLP
Silicon Valley Center
7 801 California Street
Mountain View, CA 94041
8 Telephone: 650.988.8500
Facsimile: 650.938.5200

9 Attorneys for Plaintiff
10 BRENT LUIS GONZALEZ

11 SUSAN E. COLEMAN (CSB No. 171832)
scoleman@bwsllaw.com
12 MARTIN KOSLA (CSB No. 247224)
mkosla@bwsllaw.com

13 BURKE, WILLIAMS & SORENSON, LLP
444 South Flower Street, Suite 2400
14 Los Angeles, CA 90071-2953
Telephone: 213.236.0600
15 Facsimile: 213.236.2700
Attorneys for Defendant
16 Z. AHMED, M.D.

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN JOSE DIVISION

20 BRENT LUIS GONZALEZ,
21 Plaintiff,
22 v.
23 Z. AHMED, M.D., et al.,
24 Defendants.

Case No.: 5:10-cv-05654-LHK
Assigned to Hon. Lucy H. Koh

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO EXTEND
THE DEADLINE TO AMEND THE
PLEADINGS AND ADD PARTIES**

25
26
27
28 STIPULATION TO MODIFY DEADLINE
TO AMEND PLEADINGS
CASE NO.: 5:10-cv-05654-LHK

1 Pursuant to this Court’s Minute Order and Case Management Order (Dkt. No. 107) and
2 Civil Local Rules 6-1 and 6-2, Plaintiff Brent Luis Gonzalez (“Gonzalez”) and Defendant Zahed
3 Ahmed (“Ahmed”) hereby stipulate to extend the deadline to amend the pleadings and add parties
4 until 14 days after this Court issues a decision regarding Gonzalez’s Motion for Leave to File a
5 Renewed Motion for Reconsideration of the Court’s Summary Judgment Order (Dkt. No. 108,
6 “Motion for Reconsideration”).

7 The deadline to amend the pleadings and add parties is currently set for May 31, 2013.
8 Gonzalez intends to file a Third Amended Complaint restating allegations from the Second
9 Amended Complaint, typed for the convenience of the Court and the parties, and adding
10 attorneys’ fees and costs to the relief requested. But absent a ruling from the Court on Gonzalez’s
11 Motion for Reconsideration seeking to reinstate Drs. Michael Sepulveda and Joseph Chudy as
12 defendants, the requisite scope of pleadings as to these individuals remains unclear. Under these
13 circumstances, the parties agree that it would be more efficient to delay filing of Gonzalez’s Third
14 Amended Complaint until after resolution of his pending Motion for Reconsideration.

15 Accordingly, the parties stipulate to continue the deadline to amend the pleadings and add
16 parties, and request that the Court enter an order resetting that deadline for 14 days after this
17 Court issues a decision regarding Gonzalez’s Motion for Reconsideration (Dkt. No. 108).

18
19
20
21
22
23
24
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: May 29, 2013

FENWICK & WEST LLP

By: /s/Ewa M. Davison

Lynn H. Pasahow
David K. Telleson
Melanie L. Mayer
Ewa M. Davison
David J. Austin

Attorneys for Plaintiff
BRENT LUIS GONZALEZ

Dated: May 29, 2013

BURKE, WILLIAMS & SORENSEN, LLP

By: /s/Martin Kosla

Susan E. Coleman
Martin Kosla

Attorneys for Defendant
DR. AHMED

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Ewa M. Davison, attest that concurrence in the filing of this document has been obtained from the other signatory.

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

Executed on May 29, 2013

By: /s/Ewa M. Davison

Ewa M. Davison

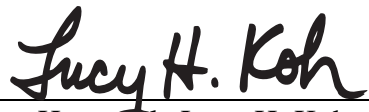
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Last day to amend pleadings and add parties is 14 days after this Court issues its decision regarding Gonzalez’s Motion for Leave to File a Renewed Motion for Reconsideration of the Court’s Summary Judgment Order (Dkt. No. 108).

Dated this 30th day of May 2013.



Honorable Lucy H. Koh
United States District Court Judge

FENWICK & WEST LLP
ATTORNEYS AT LAW
MOUNTAIN VIEW