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Attorneys for Defendant
THE PERMANENTE MEDICAL GROUP, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

ROSEMARIE COLE,

Plaintiff,

vs.

THE PERMANENTE MEDICAL GROUP, INC.,
a California corporation; KAISER MEDICAL
GROUP, INC., a California corporation

Defendants.

Case No. CV11-05378 PSG

STIPULATION RE EXTENDING TIME FOR
DEFENDANTS TO RESPOND TO
COMPLAINT BY 30 DAYS, AS WELL AS
OTHER CASE MANAGEMENT DATES
[AND ORDER]

STIPULATION

The above-named parties, by and through their respective, undersigned counsel, hereby agree to the following:

1. The complaint was filed November 7, 2011 and served November 21, 2011.
2. Because no defendant had appeared as of December 5, 2011, and there was no attorney with whom any "meet and confer" could be held, plaintiff moved on an ex parte basis to extend dates in the November 7 order, and this Court granted plaintiff's request.

1
2 3. These are the 3 Case Schedule due dates for events currently calendared pursuant to this
3 Court's order of December 9, 2011:

4 *12/20/11 (moved from 12/6)

5 *1/3/12 (moved from 12/20/11)

6 *1/10/201[2] CMC (moved from 12/27/11)

7 4. Last week counsel for plaintiff and counsel for defendant The Permanente Medical
8 Group, Inc. connected and agreed to extend the date by which defendant is to answer or
9 otherwise respond to plaintiff's complaint from 12/7/11 to 1/9/12.

10 5. That agreement was reached before this Court entered the order establishing a date
11 sequence beginning 12/20/11 – in advance of the date defendant will have to answer or
12 otherwise respond to plaintiff's complaint.

13 6. Accordingly, the parties respectfully request that this Court approve their
14 stipulation regarding the extension of the date by which defendant is to answer or
15 otherwise respond to plaintiff's complaint.

16 7. Accordingly, the parties also respectfully request that this Court extend the dates
17 presently calendared pursuant to its order of December 9, 2011, so that the first date
18 follows the date by which defendant will have prepared its answer or other response
19 to plaintiff's complaint – in other words, that the earliest Case Schedule date in this
20 case be 1/9/12.

21 8. Counsel accordingly propose the following adjustments to the Case Schedule:

22 *Shift 12/20/11 date to 1/17/12

23 *Shift 1/3/12 date to 1/31/12

24 *Shift 1/10/12 date to 2/7/12

25 Dated: December ~~12~~, 2011

MARION'S INN LLP

David M.

Rosenberg-Wohl

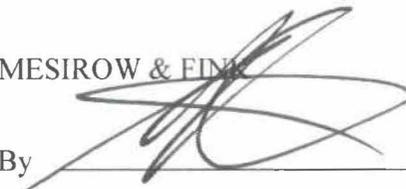
By _____

Digitally signed by David M. Rosenberg-
Wohl
DN: cn=David M. Rosenberg-Wohl,
o=Marion's Inn LLP, ou,
email=drosw@marionsinn.com, c=US
Date: 2011.12.12 13:46:53 -0800

26 David M. Rosenberg-Wohl
27 Attorneys for Defendant
28 The Permanente Medical Group, Inc.

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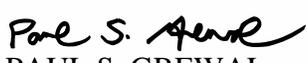
Dated: December 12, 2011

MESIROW & FINK
By 
Steven M. Fink
Attorneys for Plaintiff Rosemary Cole

ORDER

So ordered.

DATED: December 20, 2011


PAUL S. GREWAL
United States Magistrate Judge

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PROOF OF SERVICE

I, the undersigned, state:

I am over the age of eighteen and not a party to this action. My business address is 1611 Telegraph Avenue, Suite 707, Oakland, California 94612-2145, which is located in Alameda County.

On December 19, 2011 I served the attached document(s):

STIPULATION RE EXTENDING TIME FOR DEFENDANTS TO RESPOND TO COMPLAINT BY 30 DAYS, AS WELL AS OTHER CASE MANAGEMENT DATES

 X **BY MAIL.** I am familiar with the business practice at my place of business for collection and processing of correspondence for delivery by U.S. mail. Correspondence so collected and processed is placed in a sealed enveloped, with postage fully prepaid, addressed to the recipient(s) listed below, and deposited in a mailbox that same day in the ordinary course of business.

Steven M. Fink
Mesirow & Fink
160 W. Santa Clara St., Suite 1180
San Jose, CA 95113

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

Dated: December 19, 2011



Aakanksha Arora