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 EL CAMINO HOSPITAL

15 IN THE UNITED STATES DISTRICT COURT  
 16 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

18 ABIGAYIL TAMARA,  
 19 Plaintiff,

CASE NO. C12-01032 RMW  
Civil Rights

20 v.

**Stipulation and [] Order Extending  
 Litigation Schedule**

21 EL CAMINO HOSPITAL; DAVID  
 22 DIGANT; and DOES 1-20, Inclusive,  
 23 Defendants.

24 \_\_\_\_\_/

25 Plaintiff ABIGAYIL TAMARA and Defendants EL CAMINO HOSPITAL and DAVID  
 26 DIGANT hereby jointly stipulate and request through their attorneys of record as follows:

- 27 1. The Court issued its trial setting order on January 13, 2013, Docket no. 24. The Court  
 28 modified the schedule to provide extra time for discovery, based on a stipulation and

1 Order signed on November 15, 2013. Docket no. 5. The parties requested that  
2 stipulation based on their desire to enter mediation.

3 2. The current litigation schedule for this case is as follows:

4 Expert Disclosure: March 10, 2014

5 Rebuttal Expert Disclosure: April 28, 2014

6 Fact Discovery/Expert Discovery Cutoff: May 28, 2014

7 Last Day to Hear Dispositive Motions: July 25, 2014

8 Pretrial Conference: October 23, 2014

9 Jury Trial: November 3, 2014

10 3. The parties participated in mediation with Judge James Larson at JAMS on January 13,  
11 2014. They made good progress in settling the case. They discovered that the parties  
12 need further information from outside agencies and third parties before they can make  
13 further settlement commitments.

14 4. The parties anticipate that it will take three months to gather that information and hold a  
15 second mediation session with Judge Larson. They believe they can complete mediation  
16 by mid-April 2014.

17 5. Unless the deadlines are extended the parties will be forced to engage in discovery  
18 between now and the mediation. They believe that they can cooperatively exchange  
19 whatever information is necessary to settle the case, rendering discovery both  
20 unnecessary and burdensome at this point.

21 6. Wherefore, the parties request that the Court extend time for the litigation schedule as  
22 follows, enabling the parties to resolve the matter without unnecessary expenditure of  
23 resources:

24 a. Expert Disclosure: June 10, 2014

25 b. Rebuttal Expert Disclosure: July 28, 2014

26 c. Fact Discovery/Expert Discovery cutoff : August 28, 2014

27 d. Last Day to Hear Dispositive Motions: October 27, 2014

28 //

- 1 e. Pretrial Conference: January 2015  
2 f. Jury Trial: February 2015  
3

4 **IT IS SO STIPULATED.**

5 Dated: January 17, 2014

LAW OFFICES OF PAUL L. REIN

6  
7 /s/ Celia McGuinness  
By CELIA McGUINNESS, Esq.  
8 Attorneys for Plaintiff  
ABIGAYIL TAMARA

9 Dated: January 17, 2014

10 GALLOWAY, LUCCHESI,  
EVERSON & PICCHI

11 /s/ Aaron T. Schultz  
12 By AARON T. SCHULTZ, Esq.  
13 Attorneys for Defendant  
EL CAMINO HOSPITAL

14  
15 **ORDER**

16 Good cause having been shown, the Court grants the parties' stipulation and sets the  
17 following schedule:

18 Expert Disclosure: June 10, 2014

19 Rebuttal Expert Disclosure: July 28, 2014

20 Fact Discovery/Expert Discovery cutoff : August 28, 2014

21 Last Day to Hear Dispositive Motions: October 27, 2014

22 Pretrial Conference: January \_\_\_\_\_, 2015

23 Jury Trial: February \_\_\_\_\_, 2015  
24

25 **IT IS SO ORDERED.**

26  
27 Dated: \_\_\_\_\_, 2014

28   
Hon. RONALD M. WHYTE  
United States District Judge