

E-Filed: October 28, 2013

1 Jason O. Runckel, Esq. (California SBN: 198361)
 2 Thomas M. O'Connor, Esq. (California SBN: 172236)
 3 William D. O'Malley, Esq. (California SBN: 129605)
 4 O'CONNOR, RUNCKEL & O'MALLEY LLP
 5 1277 Treat Boulevard, Suite 810
 6 Walnut Creek, CA 94597
 7 Telephone: (925) 939-5600
 8 Facsimile: (925) 939-5602

9 Attorneys for Plaintiff, Jane Doe

10
 11 IN THE UNITED STATES DISTRICT COURT
 12 FOR THE NORTHERN DISTRICT OF CALIFORNIA

13 JANE DOE,

14 Plaintiff,

15 v.

16 WASHINGTON TOWNSHIP HEALTHCARE
 17 DISTRICT, WASHINGTON HOSPITAL, JON
 18 QUIANZON and ROES 1 to 25, inclusive,

19 Defendants.

Case No. CV 13-00745 HRL

20 **STIPULATION AND ~~PROPOSED~~**
 21 **ORDER TO EXTEND DISCOVERY**
 22 **(FIRST REQUEST)**

23 **STIPULATION AND ~~PROPOSED~~ ORDER TO EXTEND DISCOVERY**
 24 **(FIRST REQUEST)**

25 **STIPULATION**

26 Pursuant to LR 6.1(b) and 6.2, the parties, by and through their respective attorneys of
 27 record, stipulate and agree that the existing discovery deadlines be extended 30 days in accordance
 28 with the information set forth below.

I. Discovery Completed

The parties have completed the following discovery:

- The parties have made initial disclosures pursuant to Fed. R. Civ. Proc. 26

LAW OFFICES
 O'CONNOR, RUNCKEL & O'MALLEY LLP
 1277 TREAT BLVD., SUITE 810
 WALNUT CREEK, CALIFORNIA 94597

- 1 - The parties have served and responded to written discovery.
- 2 - The parties have subpoenaed various custodians of records and have received responses
- 3 to those subpoenas.
- 4
- 5 - The following depositions have been taken:
- 6 - Jane Doe (Plaintiff)
- 7 - Michael Platzbecker
- 8 - Joanne Furlong
- 9 - Hai Dang
- 10 - Thao Moscheiti
- 11
- 12 **II. Remaining Discovery**
- 13 - The following depositions remain:
- 14 - Bryant Welch, currently scheduled for October 15, 2013
- 15 - Kadeer Halimi, M.D., currently scheduled for October 18, 2013
- 16 - Gurpreet Singh, currently scheduled for October 28, 2013
- 17 - Fremont Police Officer, Ricardo Cortes, currently scheduled for October 30, 2013
- 18 - Fremont Police Officer (Ret.) Teresa Martinez, currently scheduled for October 30,
- 19 2013
- 20 - Bill Wescott, currently scheduled for November 7, 2013
- 21 - Joey Schreifer, currently scheduled for November 7, 2013
- 22 - Christopher Sato-Perry, M.D., currently scheduled for October 31, 2013
- 23 - Kaveri Patel, M.D., currently scheduled for October 31, 2013
- 24
- 25
- 26 - Supplemental written discovery as needed following the last depositions in November
- 27 - The parties may need to issue additional subpoenas
- 28

- 1 - Any additional discovery the parties deem necessary within the scope of permissible
 2 discovery under the Federal Rules of Civil Procedure.

3 **III. Reasons Discovery Cannot Be Completed**

4 The depositions of Bryant Welch, Bill Wescott and Joey Schreifer were originally
 5 scheduled in early September and were continued until October 15, 2013 and November 7, 2013.
 6 An additional delay was incurred when Ms. Schreifer became unavailable due to a family medical
 7 emergency. Defendant's counsel has two trial scheduled in November and therefore he was
 8 unavailable for the majority of October due to expert witness depositions for said trials. The
 9 parties therefore have had to go into November to complete depositions.
 10

11 Additional discovery may be required following the completion of the scheduled
 12 depositions and current discovery deadline does not allow enough time within which to complete
 13 it. Accordingly the parties stipulate and agree to continue the non-expert discovery deadline 30
 14 days to allow enough time to conduct any potential supplemental discovery.
 15

16 **IV. Proposed Discovery Schedule**

17 The parties stipulate and agree to the following 30 day extension of the existing Fact
 18 Discovery Cutoff:

	Current Date	Proposed Date
20 Fact Discovery Cutoff	December 2, 2013	January 2, 2014
22 Designation of Experts with Reports	February 3, 2014	February 3, 2014
24 Designation of Rebuttal Experts with Reports	March 4, 2014	March 4, 2014
26 Expert Discovery Cutoff	April 4, 2014	April 4, 2014
27 Final Pretrial Conference	June 19, 2014 at 1:30 pm	June 19, 2014 at 1:30 pm

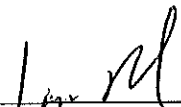
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Jury Trial

TBD

Dated: October 17, 2013

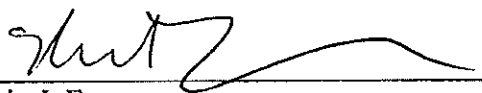
O'CONNOR, RUNCKEL & O'MALLEY



Jason O. Runckel
Attorney for Plaintiff, Jane Doe

Dated: October 16, 2013

GALLOWAY, LUCCHESI, EVERSON &
PICCHI




Martin J. Everson
Attorney for Defendant Washington Township
Healthcare District

ORDER

Pursuant to Stipulation it is so ORDERED that the Fact Discovery Cutoff is hereby
extended to **January 2, 2014**. All other scheduled dates remain in place.

Dated: 10/28/13



Howard R. Lloyd
United States Magistrate Judge