

E-Filed: December 20, 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

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DISCOVERY
(SECOND REQUEST)**

**STIPULATION AND ~~PROPOSED~~ ORDER TO EXTEND DISCOVERY
(SECOND REQUEST)**

STIPULATION

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

24 **I. Discovery Completed**

25 The parties have completed the following discovery:

- 26 - 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 - The following depositions have been taken:
- 5
 - 6 - Jane Doe (Plaintiff)
 - 7 - Michael Platzbecker
 - 8 - Joanne Furlong
 - 9 - Hai Dang
 - 10 - Thao Moscheiti
 - 11 - Bryant Welch
 - 12 - Kadeer Halimi, M.D.
 - 13 - Gurpreet Singh
 - 14 - Fremont Police Officer, Ricardo Cortes
 - 15 - Fremont Police Officer (Ret.) Teresa Martniez
 - 16 - Bill Wescott
 - 17 - Joey Schreifer
 - 18 - Christopher Sato-Perry, Psy.D.
 - 19 - Kaveri Patel, M.D.

22 **II. Remaining Discovery**

- 23 - The following depositions remain:
- 24
 - 25 - Jon Quianzon – currently incarcerated and awaiting sentencing.
 - 26 - Supplemental written discovery as needed
 - 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 deposition of Jon Quianzon, currently housed at San Quentin Prison, Inmate No.
5 AR3943, was originally scheduled to be held on December 19, 2013 at San Quentin Prison.
6 Plaintiff's counsel spoke with Mr. Quianzon's criminal attorney, Frank Leidman, who informed
7 him that Mr. Quianzon would not respond to any questions and would invoke his right under the
8 Fifth Amendment. He requested that said deposition be postponed until after Mr. Quianzon is
9 sentenced and the criminal matter is resolved. Mr. Quianzon is currently set for sentencing on the
10 criminal case on December 23, 2013 in Alameda County.
11

12 Additional discovery may be required following the completion of the Mr. Quianzon's
13 deposition and current discovery deadline does not allow enough time within which to complete it.
14 Accordingly the parties stipulate and agree to continue discovery deadlines for 30 days to allow
15 enough time to conduct any potential supplemental discovery.
16

17 **IV. Proposed Discovery Schedule**

18 The parties stipulate and agree to the following 30 day extension of the existing Discovery
19 and Expert Witness Cutoff dates:
20

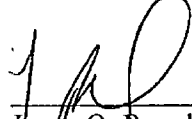
	Current Date	Proposed Date
21 Fact Discovery Cutoff	December 2, 2013	February 3, 2014
22 Designation of Experts with Reports	February 3, 2014	March 3, 2014
23 Designation of Rebuttal Experts with Reports	March 4, 2014	April 4, 2014
24 Expert Discovery Cutoff	April 4, 2014	May 5, 2014

1 Final Pretrial Conference June 19, 2014 at 1:30 pm June 19, 2014 at 1:30 pm

2 Jury Trial TBD

3
4 Dated: December 18, 2013

O'CONNOR, RUNCKEL & O'MALLEY



Jason O. Runckel
Attorney for Plaintiff, Jane Doe

5
6
7
8
9
10 Dated: December 18, 2013

GALLOWAY, LUCCHESI, EVERSON &
PICCHI



Martin J. Everson
Attorney for Defendant Washington Township
Healthcare District

11
12
13
14
15
16
17 **ORDER**

18 Pursuant to Stipulation it is so ORDERED that the Fact Discovery Cutoff and Expert

19 Witness Disclosure/Discovery is hereby extended. The new dates are as follows:

20 Fact Discovery Cutoff February 3, 2014

21 Designation of Experts with Reports March 3, 2014

22 Designation of Rebuttal Experts with
23 Reports April 4, 2014

24 Expert Discovery Cutoff May 5, 2014

25 Final Pretrial Conference June 19, 2014 at 1:30 pm

26 Jury Trial TBD

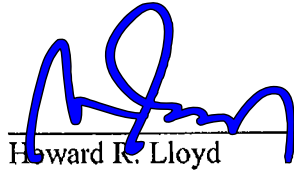
27
28

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

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

All other scheduled dates remain in place, including the last day for hearing dispositive motions on May 13, 2014.

Dated: 12/20/13



Howard R. Lloyd
United States Magistrate Judge