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 KAISER FOUNDATION HEALTH PLAN, INC.,  
 KAISER FOUNDATION HOSPITALS, and  
 THE PERMANENTE MEDICAL GROUP, INC.

[Plaintiffs' Counsel listed on next page.]

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

BRENDA HILL, MEDHANIE  
 BERNE, PATSY HARDY,  
 MICHELLE MIKE, EVELYN  
 JENNINGS and RENA  
 HARRISON, on behalf of  
 themselves and all others similarly  
 situated,

Plaintiffs,

vs.

KAISER FOUNDATION HEALTH  
 PLAN, INC.; KAISER  
 FOUNDATION HOSPITALS,  
 INC.; and THE PERMANENTE  
 MEDICAL GROUP, all doing  
 business as KAISER  
 PERMANENTE MEDICAL CARE  
 PROGRAM,

Defendants.

Case No. CV 10 2833-RS

**STIPULATION AND ~~PROPOSED~~ ORDER  
 CONCERNING THE RESETTING OF CERTAIN  
 DUE DATES AND THE HEARING DATE FOR  
 MOTIONS OF DEFENDANTS TO DISMISS  
 PLAINTIFFS' FIRST AMENDED COMPLAINT  
 OR IN THE ALTERNATIVE, TO STRIKE AND  
 FOR A MORE DEFINITE STATEMENT**

[Fed. R. Civ. P. 12(b)(6), 12(f), 12(e)]

Judge: Hon. Richard Seeborg  
 Department: Courtroom 3, 17th Floor

Complaint Filed: June 28, 2010

Motions Currently Set For: June 23, 2011 at 1:30 p.m.  
 To Be Continued To: August 25, 2011 at 1:30 p.m.

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23 BRENDA HILL, MEDHANIE BERNE,  
24 PATSY HARDY, MICHELLE MIKE,  
25 EVELYN JENNINGS and RENA HARRISON  
26  
27  
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1 IT IS HEREBY STIPULATED by and among the Plaintiffs, Brenda Hill,  
 2 Medhanie Berne, Patsy Hardy, Michelle Mike, Evelyn Jennings and Rena Harrison (hereinafter  
 3 “Plaintiffs”), by and through their counsel of record, Jeremy L. Friedman, Gordon W. Renneisen  
 4 of Cornerstone Law Group, and Kendra L. Tanacea of Law Offices of Kendra L. Tanacea, and  
 5 Defendants Kaiser Foundation Health Plan, Inc., Kaiser Foundation Hospitals, and The  
 6 Permanente Medical Group, Inc. (hereinafter “Defendants”), by and through their counsel of  
 7 record, Nancy L. Abell of Paul, Hastings, Janofsky & Walker LLP, as follows:

8 WHEREAS, the parties met and conferred on May 17, 2011 regarding Defendants’  
 9 Motions to Dismiss Plaintiffs’ First Amended Complaint or in the Alternative, To Strike and for a  
 10 More Definite Statement filed with the Court on May 2, 2011; and

11 WHEREAS, the parties have agreed to hold a second meet-and-confer  
 12 teleconference on June 23, 2011, after considering pertinent information in an effort to avoid the  
 13 necessity of a Court ruling on Defendants’ Motions.

14 THEREFORE, THE PARTIES HEREBY JOINTLY REQUEST:

15 1. That the Court continue the hearing on Defendants’ Motions to Dismiss  
 16 Plaintiffs’ First Amended Complaint or in the Alternative, to Strike and for a More Definite  
 17 Statement, which is currently set for June 23, 2011 at 1:30 p.m., to August 25, 2011, at 1:30 p.m.;

18 2. That the last day for Plaintiffs to file their Opposition to Defendants’  
 19 Motions to Dismiss Plaintiffs’ First Amended Complaint or in the Alternative, to Strike and for a  
 20 More Definite Statement shall be: August 4, 2011;

21 3. That the last day for Defendants to file their reply to Plaintiffs’ Opposition  
 22 to Defendants’ Motions to Dismiss Plaintiffs’ First Amended Complaint or in the Alternative, to  
 23 Strike and for a More Definite Statement shall be: August 11, 2011;

24 4. That the last day for the parties to respond to discovery propounded on or  
 25 before May 16, 2011 shall be: July 22, 2011; and

26 5. That the last day for the parties to exchange Rule 26 Disclosures shall be:  
 27 July 22, 2011.

**ORDER**

IT IS SO ORDERED.

Dated: 6/1/11



HONORABLE RICHARD SEEBORG  
UNITED STATES DISTRICT JUDGE

Dated: May 25, 2011

Respectfully Submitted By:

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PAUL, HASTINGS, JANOFSKY & WALKER LLP

By: /s/ Nancy L. Abell  
NANCY L. ABELL

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