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0 KAISER FOUNDATION HEALTH PLAN, INC.,
1 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.

30 Plaintiffs

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22 KAISER FOUNDATION HEALTH
23 PLAN, INC.; KAISER
24 FOUNDATION HOSPITALS,
25 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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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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By: /s/ Nancy L. Abell
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