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10 Attorneys for Plaintiffs  
11 JANE DOE, STEPHEN ALBRIGHT,  
AMERICAN KIDNEY FUND, INC.,  
12 AND DIALYSIS PATIENT CITIZENS, INC.

13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**

16 JANE DOE, *et al.*,  
17 Plaintiffs,  
18 v.  
19 ROB BONTA, in his Official  
Capacity as Attorney General of  
20 California, *et al.*,  
21 Defendants.  
22

**Case No. 8:19-cv-2105-DOC(ADSx)**  
**JOINT STIPULATION PROPOSING**  
**SCHEDULING FOR MOTIONS TO**  
**EXCLUDE EXPERT WITNESS**  
**OPINIONS**

Date: May 2, 2022  
Time: 8:30 AM  
Place: Courtroom 9D

1 Plaintiffs Jane Doe, Stephen Albright, American Kidney Fund, Inc., and  
 2 Dialysis Patient Citizens, Inc. (“Plaintiffs”) and Defendants Rob Bonta, in his Official  
 3 Capacity as Attorney General of California; Ricardo Lara in his Official Capacity as  
 4 the Director of the California Department of Insurance; Maria Watanabe in her Official  
 5 Capacity as Director of the California Department of Managed Health Care; and  
 6 Tomás J. Aragón, in his Official Capacity as Director of the California Department of  
 7 Public Health (collectively “Defendants”), by and through their attorneys of record,  
 8 hereby stipulate and agree as follows:

9 All parties have met and conferred and have agreed upon the following schedule  
 10 for Motions to Exclude Expert Opinions, subject to this Court’s approval.

Case Event	Date/Deadline
Motions to exclude due	March 4, 2022
Motions to exclude oppositions due	April 1, 2022
Motions to exclude replies due	April 18, 2022
Motions to exclude hearing	May 2, 2022

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 18 All parties agree that the above schedule only applies to Motions to Exclude  
 19 Expert Opinions brought in connection with the already filed summary judgment  
 20 motions. This schedule is not intended to prescribe or limit any party’s ability to move  
 21 to challenge these or other expert witnesses through motions in limine or at trial.

22 Dated: March 4, 2022

**KING & SPALDING LLP**

23  
 24 By: /s/Joseph N. Akrotirianakis  
 JOSEPH N. AKROTIRIANAKIS  
 MATTHEW M. LELAND  
 ASHLEY C. PARRISH  
 Attorneys for Plaintiffs  
 JANE DOE, STEPHEN ALBRIGHT,  
 27 AMERICAN KIDNEY FUND, INC.,  
 and DIALYSIS PATIENT CITIZENS,  
 28 INC.

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Dated: March 4, 2022

ROB BONTA  
Attorney General of California  
MARK R. BECKINGTON  
Supervising Deputy Attorney General

By: /s/ R. Matthew Wise  
R. MATTHEW WISE  
Supervising Deputy Attorney General  
*Attorneys for Defendants Rob Bonta,  
et al.*

**ATTESTATION**

I, Joseph N. Akrotirianakis, hereby attest that all other signatories listed above concur in this filing’s content and have authorized me to make this filing.

Dated: March 4, 2022

**KING & SPALDING LLP**

By: /s/ Joseph N. Akrotirianakis  
JOSEPH N. AKROTIRIANAKIS  
MATTHEW M. LELAND  
ASHLEY C. PARRISH

Attorneys for Plaintiffs  
JANE DOE, STEPHEN ALBRIGHT,  
AMERICAN KIDNEY FUND, INC.,  
and DIALYSIS PATIENT CITIZENS,  
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