

Misty A. Murray (SBN 196870)
MAYNARD NEXSEN LLP
10100 Santa Monica Blvd, Suite 550
Los Angeles, CA 90067
Tel: (310) 596-4377
Email: misty.murray@maynardnexsen.com

Earl B. Austin III (admitted *pro hac vice*)
BAKER BOTTS L.L.P.
Ross Avenue, Suite 900
Dallas, TX 75201-2980
Tel: (214) 953-6542
Fax: (214) 661-4542
Email: earl.austin@bakerbotts.com

Sarah Reeves (admitted *pro hac vice*)
BAKER BOTTS L.L.P.
30 Rockefeller Plaza
New York, NY 10112-4498
Tel: (212) 408-2649
Fax: (212) 269-2449
Email: sarah.reeves@bakerbotts.com

*Attorneys for Defendants Aetna Inc. and
Aetna Life Insurance Company*

Rebecca Peterson-Fisher (State Bar No. 255359)
Jennifer L. Liu (State Bar No. 279370)
KATZ BANKS KUMIN LLP
235 Montgomery St. Suite 665
San Francisco, CA 94104
Tel: (415) 813-3260
Fax: (415) 813-2495
Email: peterson-fisher@katzbanks.com
liu@katzbanks.com

Barbara J. Chisholm (SBN 224656)
Danielle E. Leonard (SBN 208201)
Connie K. Chan (SBN 284230)
Robin S. Tholin (SBN 344845)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Tel: (415) 421-7151
Fax: (415) 362-8064
Email: bchisholm@altshulerberzon.com
dleonard@altshulerberzon.com
cchan@altshulerberzon.com
rtholin@altshulerberzon.com

*Attorneys for Plaintiff and the Putative Class
Additional counsel listed on following page

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

MARA BERTON, on behalf of herself and all
others similarly situated,

Plaintiff,

v.

AETNA INC. and AETNA LIFE INSURANCE
COMPANY,
Defendants.

Case No. 4:23-cv-01849-HSG

**JOINT STIPULATION AND
[PROPOSED] ORDER TO EXTEND
DEADLINES AND CONTINUE
FAIRNESS HEARING**

STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES AND CONTINUE FAIRNESS
HEARING

Case No. 4:23-cv-01849-HSG

Michelle Banker (admitted *pro hac vice*)
Alison Tanner (admitted *pro hac vice*)
Noel León (admitted *pro hac vice*)
NATIONAL WOMEN'S LAW CENTER
1350 I Street NW, Suite 700
Washington, DC 20005
Tel: (202) 588-5180
Email: mbanker@nwlc.org
atanner@nwlc.org
nleon@nwlc.org

Hugh Baran (admitted *pro hac vice*)
KATZ BANKS KUMIN LLP
111 Broadway, Suite 1403
New York, NY 10006
Tel: (646) 759-4501
Fax: (646) 759-4502
Email: baran@katzbanks.com

Marilyn Robb (admitted *pro hac vice*)
KATZ BANKS KUMIN LLP
11 Dupont Circle NW, Suite 600
Washington, DC 20036
Tel: (202) 299-1140
Fax: (202) 299-1148
Email: robb@katzbanks.com

Attorneys for Plaintiff and the Putative Class

1 WHEREAS, on December 17, 2025, the Court granted Plaintiff's motion for
2 preliminary certification of a settlement class and preliminary approval of the parties' proposed
3 class action settlement (ECF No. 139);

4 WHEREAS, on January 9, 2026, the Parties filed a Joint Stipulation to Schedule of
5 Deadlines Following the Court's Preliminary Approval Order (ECF No. 145);

6 WHEREAS, on January 30, 2026, the Court entered an Amended Scheduling Order
7 adopting the proposed schedule (ECF No. 146);

8 WHEREAS, on May 27, 2026, the Clerk gave notice of the continuance of the Fairness
9 Hearing and hearing on the Motion for Attorneys' Fees, Costs and Service Award to November
10 19, 2026 (ECF No. 148);

11 WHEREAS, the Parties have been actively engaged with the Settlement Administrator
12 regarding questions of eligibility and cures for deficient claims throughout the claims period;

13 WHEREAS, the deadline to file claims was June 29, 2026;

14 WHEREAS, numerous claims were submitted just before the deadline;

15 WHEREAS, the deadline to correct deficient submissions is currently August 28, 2026;

16 WHEREAS, as of August 10, 2026, the Settlement Administrator reported 59 claims
17 were deficient and required cures;

18 WHEREAS, the Administrator is continuing its efforts to make contact with all
19 claimants whose submissions were deficient to assist them in curing their claims, with support
20 from Class Counsel;

21 WHEREAS, in many cases, curing claims will require obtaining and submitting
22 additional documentation of medical procedures and/or payment for medical procedures from
23 third parties, and these third parties may not appreciate the urgency of quickly producing that
24 documentation;

25 WHEREAS, unless the deadline to correct deficient claims is extended, dozens of Class
26 Members who would otherwise be eligible to receive settlement payments of \$11,408 or more
27 likely will not receive any payment;

WHEREAS, the Parties agree that good cause exists to extend the deadline to correct deficient claims by sixty days to enable as many claimants as possible to cure their submissions;

WHEREAS, the Parties agree that extending the deadline to correct deficient claims requires extensions of subsequent deadlines and continuance of the Fairness Hearing and hearing on the Motion for Attorneys' Fees, Costs, and Service Award;

WHEREAS, the extensions of deadlines are acceptable to the Special Master;

WHEREAS, the Parties have not previously requested to extend any of these deadlines, and do not believe further extensions will be needed;

THE PARTIES THEREFORE stipulate and respectfully request that, good cause existing therefor, pursuant to Federal Rule of Civil Procedure Rule 16 and Civil Local Rule 16-10, the Court approve the following Amended Schedule, to replace the current schedule set forth in ECF No. 146:

Event	Original Deadline	Amended Deadline
Last day for corrections to deficient submissions	August 28, 2026	October 27, 2026
Last day for Special Master to determine disputes re: validity of claims for eligibility purposes; preliminary Special Harms Allocations to parties/Administrator	September 12, 2026	November 11, 2026
Administrator to report final class size to the parties, deadline for Aetna to determine Dollars for Benefits Payments	September 17, 2026	November 16, 2026
Deadline for final Special Harms Allocation determinations, resolution of contested Dollars for Benefits Payments, redistribution payments to be determined	October 2, 2026	December 1, 2026
Final Approval Motion due	October 12, 2026	December 11, 2026
Fairness Hearing	November 19, 2026, 2:00 pm	January 14, 2027, 2:00 pm
Funding Date	30 days after Effective Date	same

1 2 3 4 5 6	Payment date for settlement awards, Dollars for Benefits Payments, service award, attorneys' fees and costs	10 business days after Funding Date	same
7 8 9 10 11 12 13 14 15	Payment date for Dollars for Benefits Payments	60 days after the Effective Date	same
16 17 18 19 20 21 22 23 24 25 26 27 28	Check-cashing deadline	180 days after initial issuance, at least 90 days for re-issued checks	same

Respectfully submitted,

KATZ BANKS KUMIN LLP

DATED: August 25, 2026

/s/ Rebecca Peterson-Fisher

Rebecca Peterson-Fisher
235 Montgomery St. Suite 665
San Francisco, CA 94104
Tel: (415) 813-3260
Fax: (415) 813-2495
Email: Peterson-Fisher@katzbanks.com

Attorneys for Plaintiff and the Putative Class

MAYNARD NEXSEN LLP

DATED: August 25, 2026

/s/ Misty A. Murray

Misty A. Murray
10100 Santa Monica Blvd, Suite 550
Los Angeles, CA 90067
Telephone: (310) 596-4377
Email: misty.murray@maynardnexsen.com

BAKER BOTTS LLP

Earl B. Austin, III
2001 Ross Avenue, Suite 900
Dallas, TX 75201-2980
Tel: (214) 953-6542
Fax: (214) 661-4542
Email: earl.austin@bakerbotts.com

Sarah Reeves
30 Rockefeller Plaza
New York, NY 10112-4498
Tel: (212) 408-2649
Fax: (212) 259-2449
Email: sarah.reeves@bakerbotts.com

*Attorneys for Defendants Aetna Inc. and Aetna
3Life Insurance Inc.*

STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES AND CONTINUE FAIRNESS
HEARING

1 PURSUANT TO STIPULATION, AND GOOD CAUSE EXISTING THEREFOR, IT IS
2 SO ORDERED.

3
4 DATED: _____

5 HON. HAYWOOD S. GILLIAM, JR.
6 UNITED STATES DISTRICT JUDGE
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3) regarding signatures, I, Rebecca Peterson-Fisher, hereby attest that concurrence in the filing of this document has been obtained from the other signatory to this document.

/s/ Rebecca Peterson-Fisher

Rebecca Peterson-Fisher