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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

KISTING-LEUNG, *et al.*,

Plaintiffs,

v.

CIGNA CORPORATION, *et al.*,

Defendants.

CASE NO. 2:23-cv-01477-DAD-CSK

**JOINT STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINES**

Pursuant to Local Rules 143 and 144, Plaintiffs Samantha Dababneh and Randall Rentsch (“Plaintiffs”) and Defendants The Cigna Group (f/k/a Cigna Corporation) and Cigna Health and Life Insurance Company (together, “Cigna” or “Defendants”) (collectively, the “Parties”) stipulate and agree to extend the schedule in this case as set forth below, subject to this Court’s approval. In further support, the Parties state as follows:

WHEREAS, the Order to Extend Interim Discovery Deadlines (ECF No. 86) states that the Parties shall complete fact depositions by September 30, 2026; the Order to Extend Deadlines (ECF No. 84) states that any motion for class certification will be fully briefed by February 24, 2027, and the Parties shall complete expert discovery by March 25, 2027; the Scheduling Order (ECF No. 60) states that all motions shall be filed by April 26, 2027 and noticed for hearing no later than 60 days from the filing date, the final pretrial conference date shall be set for September 27, 2027, and trial shall be set for November 30, 2027 (collectively, the “Scheduling Orders”);

WHEREAS, as set forth in the Parties’ Joint Scheduling Report Pursuant to Rule 26(f) (ECF No. 58), the Parties have agreed to utilize the same document custodians, search terms, relevant time period, and technology-assisted review protocol as in *Snyder, et al. v. The Cigna Group, Cigna Health and Life Ins. Co. and Cigna Health Mgmt., Inc.*, 3:23-cv-1451-OAW (D. Conn. Nov. 2, 2023) (the “*Snyder Action*”), which is another class action involving Cigna’s Px Dx process;

WHEREAS, since the Scheduling Orders were entered, the Parties have been diligently engaging in discovery and have mostly completed document productions: Cigna has produced nearly 2.1 million pages of documents in total, consisting of documents reviewed pursuant to the Parties’ TAR Protocol as well as documents reviewed outside of TAR, and Plaintiffs have produced documents in their possession, custody, or control responsive to Cigna’s discovery requests, though some supplemental searches are still underway by both Parties;

WHEREAS, in March 2026, the Parties agreed to coordinate depositions with the *Snyder Action* such that Cigna’s witnesses would only be deposed once across both actions;

WHEREAS, on April 8, 2026, Plaintiffs served Cigna with a Rule 30(b)(6) Deposition Notice with 23 topics;

WHEREAS, based on the Rule 30(b)(6) Deposition Notice served in the *Snyder* Action, which substantially overlaps with Plaintiffs' notice, Cigna has identified two witnesses to serve as Rule 30(b)(6) corporate representatives in both cases and served its amended responses and objections to the Plaintiffs' Rule 30(b)(6) Deposition Notice on April 30, 2026;

WHEREAS, on April 16, 2026, Plaintiffs served a Rule 30(b)(1) Deposition Notice on ten individuals that overlap with the noticed individuals in the *Snyder* Action;

WHEREAS, the first 30(b)(6) deposition of Cigna took place on April 21, 2026, and seven additional 30(b)(1) depositions of Cigna witnesses and one of the named Plaintiffs have also taken place with additional depositions scheduled in the remaining discovery period;

WHEREAS, although substantial progress has been made on discovery, as a result of negotiations in the *Snyder* Action regarding the timing of the deposition of Cigna's remaining 30(b)(6) witness, who has also been noticed as a 30(b)(1) witness, the Parties have mutually agreed to schedule this deposition on October 13-15, 2026, which is after the current fact discovery deadline in this case;

WHEREAS, the Parties have agreed and believe good cause exists to extend the discovery schedule by approximately two weeks to accommodate the deposition of Cigna's remaining 30(b)(6) corporate representative and to briefly extend the other case deadlines accordingly;

WHEREAS, this Court has once previously extended the deadlines that are the subject of this stipulation;

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties, through their respective counsel and subject to the Court's approval, that the Parties agree to extend the case schedule as follows:

Revised Deadline	Event
September 30, 2026	Parties complete fact discovery and fact depositions other than the duly noticed Rule 30(b)(6) and Rule 30(b)(1) deposition of Cigna's remaining corporate representative
October 15, 2026	Parties complete the duly noticed Rule 30(b)(6) and Rule 30(b)(1) deposition of Cigna's remaining corporate representative

Revised Deadline	Event
October 29, 2026	Plaintiffs file class certification brief and disclose initial experts and produce reports
January 11, 2027	Defendants file class certification opposition brief and disclose initial experts and produce reports
March 15, 2027	Plaintiffs file class certification reply brief and disclose rebuttal experts and produce reports
April 14, 2027	Parties complete expert discovery
May 17, 2027	All motions to be filed, except motions for continuances, temporary restraining orders, or other emergency applications, and noticed for hearing on a date not more than 60 days from the date the motion is filed

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: August 24, 2026

Respectfully submitted,

/s/ Simeon A. Morbey

/s/ Richard W. Nicholson, Jr.

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**[PROPOSED] ORDER TO EXTEND
DEADLINES**

Having considered the Parties' Joint Stipulation and [Proposed] Order to Extend Deadlines, the Court HEREBY ORDERS as follows:

Revised Deadline	Event
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2026

By: _____

Hon. Dale A. Drozd
United States District Judge