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Attorneys for Defendants
The Cigna Group (f/k/a Cigna Corporation) and
Cigna Health and Life Insurance Company

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SUZANNE KISTING-LEUNG, SAMANTHA
DABABNEH, RANDALL RENTSCH, and
CHRISTINA THORNHILL, individually and on
behalf of all other similarly situated,

Plaintiffs,

v.

CIGNA CORPORATION, CIGNA HEALTH
AND LIFE INSURANCE COMPANY, and
DOES 1 through 50, inclusive,

Defendants.

Case No. 2:23-cv-01477-DAD-KJN

**CIGNA'S AMENDED NOTICE OF
MOTION AND MOTION TO DISMISS
THE SECOND AMENDED CLASS
ACTION COMPLAINT**

Date: June 4, 2024
Time: 1:30 P.M.
Judge Hon. Dale A. Drozd
Courtroom: 4, 15th floor
Second Am. Compl. Filed: December 18, 2023

PLEASE TAKE NOTICE that on June 4, 2024 at 1:30 p.m. (or as soon thereafter as the matter may be heard in Courtroom 4, 15th Floor of the above-entitled Court), The Cigna Group (f/k/a Cigna Corporation) and Cigna Health and Life Insurance Company (together, “Cigna” or “Defendants”) will move the Court for an for an order dismissing the Second Amended Complaint of Plaintiffs Suzanne Kisting-Leung, Samantha Dababneh, Randall Rentsch, and Cristina Thornhill, pursuant to Federal Rules of Civil Procedure 9(b), 12(b)(1), and 12(b)(6). The Motion is based on this Amended Notice of Motion and Motion to Dismiss, the Memorandum of Points and Authorities previously filed on February 1, 2024 (ECF No. 28), argument of counsel, and other such matters as the Court may consider.

MEET AND CONFER CERTIFICATION

Pursuant to the Court’s Civil Standing Order I.C, counsel for Defendants initiated a meet and confer with counsel for Plaintiffs by telephone on January 24, 2024 concerning the subject matter of this motion. Counsel for Defendants advised of their intent to move to dismiss all claims and stated the specific grounds for the motion. Despite their good-faith efforts at informal resolution, the parties were unable to avoid the need for this motion.

Dated: February 5, 2024

Respectfully submitted,

By: /s/ Dmitriy Tishyevich
Dmitriy Tishyevich

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