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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SUZANNE KISTING-LEUNG, *et al.*,

Plaintiffs,

v.

CIGNA CORPORATION, *et al.*,

Defendants.

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

~~PROPOSED~~ **STIPULATED ORDER
REGARDING THE COLLECTION AND
PRODUCTION OF DOCUMENTS AND
ELECTRONICALLY STORED
INFORMATION**

Defendants the Cigna Group (f/k/a Cigna Corporation) and Cigna Health and Life Insurance Company (together, “Cigna” or “Defendants”) and Samantha Dababneh, Randall Rentsch, and Abdulhussein Abbas (collectively “Plaintiffs”) (individually, a “Party” and collectively, the “Parties”), by and through their respective counsel, hereby stipulate as follows:

1) As set forth in the Parties’ Joint Scheduling Report Pursuant to Rule 26(f) (Dkt. 58), filed on May 23, 2025, the Parties have agreed to utilize the same document custodians, search terms, relevant time period, and technology assisted review protocol (“TAR 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) (“*Snyder* Action”).

2) The Parties also intend to use the Stipulation Regarding the Collection and Production of Documents and Electronically Stored Information from the *Snyder* Action (“ESI Stipulation”), attached as Exhibit A, which sets forth various requirements—such as requirements regarding field names, de-duplication, email threading, and privilege logs—that the Parties agree should be the same in the above-captioned action as they are in the *Snyder* Action, to enable Cigna to utilize its document productions from the *Snyder* Action in this action.

3) Section II.A of the ESI Stipulation sets forth disclosure and meet and confer requirements regarding custodians, Section III.A requires the parties to meet and confer regarding search terms, date ranges, and other search queries and methodologies, and Section III.B obligates the parties to meet and confer regarding an appropriate TAR protocol and search terms and sources of ESI to be searched. As set forth in paragraph 1 herein, the parties have agreed that Cigna may utilize the same custodians, search terms, date ranges, and TAR Protocol from the *Snyder* Action, and therefore stipulate that Cigna has complied with its obligations set forth in Sections II.A, III.A, and III.B of the ESI Stipulation already.

4) The Parties further stipulate that, as set forth in the Parties’ Joint Scheduling Report Pursuant to Rule 26(f), they agree to meet and confer to discuss additional search terms specific to the named Plaintiffs in this matter (such as names and plan sponsor information) that may be

necessary. The process by which the parties intend to conduct that process is set forth in the Stipulated Order Regarding Use of Technology Assisted Review (Dkt. 65).

5) Section VII of the ESI Stipulation sets forth various requirements for the parties' privilege logs. For the avoidance of doubt, the Parties agree that Cigna may produce the same privilege logs in both the *Snyder* Action and in the above-captioned matter, which Plaintiffs will retain the right to independently challenge using the procedure set forth in Section VII. To the extent the Parties agree to case-specific additional search terms in this matter (as discussed in paragraph 4) that result in Cigna identifying additional responsive, privileged documents, Cigna will produce a corresponding log for those documents consistent with the requirements of the ESI Stipulation.

6) The Parties agree that all references to the Local Rules of the District of Connecticut in the ESI Stipulation should be stricken and replaced by references to the Local Rules of the Eastern District of California.

7) The Parties otherwise agree that the provisions set forth in the ESI Stipulation shall apply in the above-captioned matter.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: September 11, 2025

Respectfully submitted,

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 11, 2025

By:



Honorable Chi Soo Kim
United States Magistrate Judge

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