

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

The Estate of Gene B. Lokken, Glennette Kell, Darlene Buckner, Carol Clemens, The Estate of Frank Chester Perry, The Estate of Jackie Martin, John J. Williams, as Trustee of the Miles and Carolyn Williams 1993 Family Trust, and William Hull, individually and on behalf of all others similarly situated,

Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC.,
UNITED HEALTHCARE, INC.,
NAVIHEALTH, INC. and Does 1-50,
inclusive,

Defendants.

Civil File No. 23-cv-03514-JRT-SGE

**STIPULATION TO EXTEND
DEADLINE FOR DEFENDANTS TO
ANSWER THE AMENDED
COMPLAINT**

Plaintiffs The Estate of Gene B. Lokken, Glennette Kell, Darlene Buckner, Carol Clemens, The Estate of Frank Chester Perry, The Estate of Jackie Martin, John J. Williams, as Trustee of the Miles and Carolyn Williams 1993 Family Trust, and William Hull (“Plaintiffs”) and Defendants UnitedHealth Group, Inc., United Healthcare, Inc., and NaviHealth, Inc. (“Defendants”), by and through their undersigned counsel, hereby agree and stipulate as follows:

1. On April 5, 2024, Plaintiffs filed their First Amended Class Action Complaint. The Amended Complaint is brought by eight different named Plaintiffs and includes 275-numbered paragraphs.

2. On May 20, 2024, Defendants moved to dismiss the Amended Complaint.

3. On February 13, 2025, the Court granted in part and denied in part Defendants' Motion to Dismiss the Amended Complaint.

4. Under Rule 12(a)(4)(A) of the Federal Rules of Civil Procedure, the current deadline for Defendants to answer, move, or otherwise respond to the Amended Complaint is February 27, 2025.

5. The Parties agree that Defendants shall have an extension until March 27, 2025, to answer Plaintiffs' Amended Complaint.

Dated: February 25, 2025

LOCKRIDGE GRINDAL NAUEN PLLP
Karen Hanson Riebel (#0219770)
David W. Asp (#0344850)
Derek C. Waller (#0401120)
Emma Ritter Gordon (#0404000)
100 Washington Ave. South, Suite 2200
Minneapolis, MN 55401
Telephone: 612-339-6900
khriebel@locklaw.com
dwasp@locklaw.com
erittergordon@locklaw.com
dcwaller@locklaw.com

Glenn A. Danas, Esq.
Ryan Clarkson, Esq.
Zarrina Ozari, Esq.

By s/ Michael A. Boelter

Michael A. Boelter, Esq.

Pro Hac Vice

CLARKSON LAW FIRM, P.C.

22525 Pacific Coast Highway

Malibu, CA 90265

Telephone: 213-788-4050

gdanas@clarksonlawfirm.com

reclarkson@clarksonlawfirm.com

zozari@clarksonlawfirm.com

mboelter@clarksonlawfirm.com

James Pizzirusso, Esq.
Nicholas Murphy, Esq.
Pro Hac Vice
HAUSFELD LLP
888 16th St., NW, Ste. 300
Washington, DC 20006
Telephone: (202) 540-7200
jpizzirusso@hausfeld.com
nmurphy@hausfeld.com

Attorneys for Plaintiffs

Dated: February 25, 2025

DORSEY & WHITNEY LLP

By s/ Michelle S. Grant
Nicole Engisch (#0215284)
engisch.nicole@dorsey.com
Michelle S. Grant (#0311170)
grant.michelle@dorsey.com
Shannon L. Bjorklund (#0389932)
bjorklund.shannon@dorsey.com
50 South Sixth Street, Suite 1500
Minneapolis, MN 55402
Telephone: (612) 340-2600
Facsimile: (612) 340-2868

Nicholas J. Pappas (*pro hac vice*)
Pappas.nicholas@dorsey.com
DORSEY & WHITNEY LLP
51 West 52nd Street
New York, NY 10019-6119
Telephone: (212) 415-9387

Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

The Estate of Gene B. Lokken, Glennette Kell, Darlene Buckner, Carol Clemens, The Estate of Frank Chester Perry, The Estate of Jackie Martin, John J. Williams, as Trustee of the Miles and Carolyn Williams 1993 Family Trust, and William Hull, individually and on behalf of all others similarly situated,

Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC.,
UNITED HEALTHCARE, INC.,
NAVIHEALTH, INC. and Does 1-50,
inclusive,

Defendants.

Civil File No. 23-cv-03514-JRT-SGE

**[PROPOSED] ORDER GRANTING
PARTIES' STIPULATION TO
EXTEND DEADLINE FOR
DEFENDANTS TO RESPOND TO
THE AMENDED COMPLAINT**

Having considered the Parties' Stipulation to Extend Deadline for Defendants to Respond to the Amended Complaint (Doc. 92), IT IS HEREBY ORDERED: Defendants shall Answer Plaintiffs' Amended Complaint on or before March 27, 2025.

Dated: _____

Honorable Shannon G. Elkins
United States Magistrate Judge