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 Oakland¹, Michelle Ednacot, And Dr. Nicholas
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 Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA

G.H., a minor, by REBECCA HOOLEY the
 mother, legal guardian, and next friend of G.H.

Plaintiffs,

v.

UNIVERSITY OF CALIFORNIA BOARD OF
 REGENTS; UCSF BENIOFF CHILDREN'S
 HOSPITALS; MICHELLE EDNACOT, in her
 individual and official capacity as the CHAMPS
 program manager at UCSF BENIOFF
 CHILDREN'S HOSPITAL OAKLAND; DR.
 NICHOLAS HOLMES, in his individual and
 official capacity as President of UCSF
 BENIOFF CHILDREN'S HOSPITALS; and
 JANET REILLY, in her official capacity as
 President of the UNIVERSITY OF
 CALIFORNIA BOARD
 OF REGENTS,

Defendants.

Case No. 3:25-cv-01399-RFL

**STIPULATION AND PROPOSED
 ORDER TO FURTHER EXTEND TIME
 TO RESPOND TO COMPLAINT AND
 TO CONTINUE CASE MANAGEMENT
 CONFERENCE AND DEADLINES**

Date Action Filed: February 11, 2025
 Trial Date: None

¹ Erroneously sued as "UCSF BENIOFF CHILDREN'S HOSPITALS."

1 Plaintiffs, G.H., a minor, by REBECCA HOOLEY, the mother, legal guardian, and next
 2 friend of G.H., and Defendants Children’s Hospital & Research Center at Oakland (“BCH
 3 Oakland”), Michelle Ednacot, Dr. Nicholas Holmes, The Regents of the University of
 4 California (“The Regents”) and Janet Reilly (collectively “Defendants”), each through their
 5 respective attorneys of record, hereby stipulate to extend the time for Defendants to respond to
 6 Plaintiffs’ Complaint and continue the initial Case Management Conference currently scheduled
 7 for November 19, 2025, at 10:00 a.m., and corresponding deadlines. Said stipulation is made in
 8 accordance with Northern District Local Rules 6-2, 7-12, or 16-2(e) and is based upon the
 9 following facts and circumstances:

- 10 1. Plaintiffs filed the Complaint in this matter on February 11, 2025. Dkt. No. 1.
- 11 2. On February 12, 2025, the Court entered an Order Setting Initial Case Management
 12 Conference and ADR deadlines. Dkt. No. 4.
- 13 3. On February 18, 2025, the Court entered orders rescheduling the Initial Case
 14 Management Conference to May 14, 2025, at 10:00 a.m., with case management statements due
 15 by May 7, 2025. Deadlines for ADR compliance and discovery cutoff were unchanged,
 16 including for the parties to file ADR certifications and complete their Rule 26(f) conference by
 17 April 24, 2025, and to make initial disclosures by May 8, 2025. Dkt. Nos. 12 and 13.
- 18 4. Defendants The Regents and Ms. Reilly returned waivers of service of summons on
 19 March 20, 2025. Dkt. Nos. 16-17.
- 20 5. On April 22, 2025, Plaintiffs and Defendants The Regents and Ms. Reilly filed a joint
 21 stipulation to extend their time to respond to the Complaint and to postpone the Initial Case
 22 Management Conference. Dkt. No. 18. The Court granted the stipulation on April 24, 2025,
 23 rescheduled the Initial Case Management Conference for July 9, 2025, at 10:00 a.m., and
 24 extended Defendants The Regents and Ms. Reilly’s responsive pleadings deadline from May 13,
 25 2025, to June 13, 2025. Dkt. No. 25.
- 26 6. Defendants BCH Oakland, Ms. Ednacot, and Dr. Holmes returned waivers of the service
 27 of summons on May 30, 2025, making their responsive pleadings to Plaintiffs’ Complaint due
 28 by June 30, 2025. Dkt. Nos. 26, 27, 28.

7. Between May 20, 2025, and June 2, 2025, the parties met and conferred over email and by video call to discuss early resolution of this case. All parties agreed that extending the time for all Defendants to respond to the Complaint and continuing the Initial Case Management Conference and related deadlines would allow the parties to engage in settlement discussions.

8. On June 4, 2025, the parties filed a joint stipulation to extend Defendants' time to respond to Plaintiffs' Complaint. On June 5, 2025, the Court granted the joint stipulation to extend Defendants' time to respond to Plaintiffs' Complaint and to continue the Case Management Conference and related deadlines. Dkt. Nos. 29, 30. The same day, the Court granted the parties' joint stipulation, but further noted the parties' Case Management Statement shall be due by September 3, 2025, and the Initial Case Management Conference is set for September 10, 2025. Dkt. No. 31.

9. From June 5, 2025, through August 8, 2025, the parties continued to engage in settlement discussions.

10. On August 12, 2025, Plaintiffs and Defendants filed a joint stipulation to extend their time to respond to the Complaint and to postpone the Initial Case Management Conference. Dkt. Nos. 32, 33. The Court granted the stipulation on August 13, 2025, rescheduled the Initial Case Management Conference for November 12, 2025, at 10:00 a.m., and extended Defendants' responsive pleadings deadline from September 2, 2025, to November 3, 2025. Dkt. No. 34. On October 2, 2025, the Court further continued the Initial Case Management Conference from November 12, 2025, at 10:00 a.m. to November 19, 2025 at 10:00 a.m. Dkt. No. 36.

11. From August 13, 2025, through present, the parties have continued to engage in settlement discussions and feel that early resolution of this matter is imminent.

12. For the foregoing reasons, Plaintiffs, Defendants BCH Oakland, Ms. Ednacot, Dr. Holmes, The Regents, and Ms. Reilly jointly and respectfully request that the Court extend the deadlines as follows:

Case Management Event	Current Deadline	Proposed Deadline
BCH Oakland, Ms. Ednacot, Dr. Holmes, The Regents and Ms.	11/3/25	12/3/25

Reilly's Response to the Complaint		
Deadline to file ADR Certification. (See ADR L.R. 3)	11/18/25	12/19/25
Deadline to meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan. (See F.R. Civ. P. 26(f))	11/18/25	12/19/25
Deadline to make initial disclosures. (See F.R. Civ. P. 26(a)(1))	11/3/25	12/3/25
Deadline to file Joint Case Management Statement. (See Standing Order for All Judges of the Northern District of California)	11/3/25	12/3/25
Initial Case Management Conference	11/10/25 10 a.m.	12/9/25 10 a.m.

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

Respectfully submitted this 30th day of October 2025.

NARAYAN TRAVELSTEAD KU P.C.

/s/ Timothy C. Travelstead

Timothy C. Travelstead, Esq.

Scott C. Ku, Esq.

Attorneys for Defendants

Children's Hospital & Research Center at Oakland,
Michelle Ednacot, and Dr. Nicholas Holmes

1
2 WILMER CUTLER PICKERING HALE AND
3 DORR LLP
4

5 /s/ Felicia H. Ellsworth
6 Felicia H. Ellsworth*
7 Debo Adegbile*
8 Attorneys for Defendants
9 The Regents of the University of California and
10 Janet Reilly
11 *admitted pro hac vice
12

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14 PACIFIC LEGAL FOUNDATION
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16 /s/ Andrew R. Quinio
17 Andrew R. Quinio, Esq.
18 Attorneys for Plaintiffs
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 JANET REILLY, in her official capacity as
 President of the UNIVERSITY OF
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Defendants.

Case No. 3:25-cv-01399-RFL

**[PROPOSED] ORDER GRANTING
 STIPULATION TO EXTEND TIME TO
 RESPOND TO COMPLAINT AND TO
 CONTINUE CASE MANAGEMENT
 CONFERENCE AND DEADLINES**

Date Action Filed: February 11, 2025
 Trial Date: None

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1 Having considered the Parties' Stipulation to Extend Time to Respond to the Complaint
2 and Continue the Case Management Conference and Deadlines, and finding good cause has
3 been shown to extend and continue such deadlines,

4 IT IS ORDERD that the deadline to respond to Plaintiffs' Complaint be extended and
5 that the Case Management Conference and related Deadlines be re-scheduled as stipulated by
6 the Parties.

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8 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

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11 Dated: _____

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13 JUDGE OF THE DISTRICT COURT
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