Timothy C. Travelstead, Esq. (SBN 215260) 1 Scott C. Ku, Esq. (SBN 314970) NARAYAN TRAVELSTEAD KU P.C. 2 7901 Stoneridge Drive, Suite 230 Pleasanton, CA 94588 3 Telephone: (650) 403-0150 Email: t.travelstead@ntkattornevs.com 4 Email: s.ku@ntkattornevs.com Attorneys for Defendants 5 Children's Hospital & Research Center At Oakland¹, Michelle Ednacot, And Dr. Nicholas 6 Holmes 7 Felicia H. Ellsworth* Andrew R. Quinio Debo Adegbile* Haley Dutch* 8 WILMER CUTLER PICKERING HALE PACIFIC LEGAL FOUNDATION AND DORR LLP 555 Capitol Mall, Suite 1290 9 60 State Street Sacramento, CA 95814 Telephone: (916) 419-7111 Boston, MA 02109 10 Telephone: (617) 526-6000 Email: aquinio@pacificlegal.org Email: felicia.ellsworth@wilmerhale.com Email: hdutch@pacificlegal.org 11 Email: debo.adegbile@wilmerhale.com Attorneys for Plaintiffs Attorneys for Defendants *admitted pro hac vice 12 The Regents of the University of California and Janet Reilly 13 *admitted pro hac vice 14 UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA 15 Case No. 3:25-cv-01399-RFL G.H., a minor, by REBECCA HOOLEY the mother, legal guardian, and next friend of G.H. 16 [PROPOSED] ORDER GRANTING Plaintiffs. 17 STIPULATIONTO EXTEND TIME TO RESPOND TO COMPLAINT AND TO 18 CONTINUE CASE MANAGEMENT UNIVERSITY OF CALIFORNIA BOARD OF CONFERENCE AND DEADLINES 19 REGENTS; UCSF BENIOFF CHILDREN'S HOSPITALS; MICHELLE EDNACOT, in her 20 individual and official capacity as the CHAMPS program manager at UCSF BENIOFF Date Action Filed: 21 February 11, 2025 CHILDREN'S HOSPITAL OAKLAND: DR. Trial Date: None 22 NICHOLAS HOLMES, in his individual and official capacity as President of UCSF 23 BENIOFF CHILDREN'S HOSPITALS; and JANET REILLY, in her official capacity as 24 President of the UNIVERSITY OF CALIFORNIA BOARD 25 OF REGENTS, 26 Defendants. 27

[PROPOSED] ORDER GRANTING STIPULATION (BE-165)

28

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

Case 3:25-cv-01399-RFL Document 33 Filed 08/12/25

[PROPOSED] ORDER GRANTING STIPULATION (BE-165)

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

Page 2 of 2

Timothy C. Travelstead, Esq. (SBN 215260) 1 Scott C. Ku, Esq. (SBN 314970) NARAYAŃ TRAVELSTEAD KU P.C. 2 7901 Stoneridge Drive, Suite 230 Pleasanton, CA 94588 3 Telephone: (650) 403-0150 Email: t.travelstead@ntkattornevs.com 4 Email: s.ku@ntkattornevs.com Attorneys for Defendants 5 Children's Hospital & Research Center At Oakland¹, Michelle Ednacot, And Dr. Nicholas 6 Holmes 7 Felicia H. Ellsworth* Andrew R. Quinio Debo Adegbile* Haley Dutch* 8 WILMER CUTLER PICKERING HALE PACIFIC LEGAL FOUNDATION AND DORR LLP 555 Capitol Mall, Suite 1290 9 60 State Street Sacramento, CA 95814 Telephone: (916) 419-7111 Boston, MA 02109 10 Telephone: (617) 526-6000 Email: aquinio@pacificlegal.org Email: felicia.ellsworth@wilmerhale.com Email: hdutch@pacificlegal.org 11 Email: debo.adegbile@wilmerhale.com Attorneys for Plaintiffs Attorneys for Defendants *admitted pro hac vice 12 The Regents of the University of California and Janet Reilly 13 *admitted pro hac vice 14 UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA 15 Case No. 3:25-cv-01399-RFL G.H., a minor, by REBECCA HOOLEY the mother, legal guardian, and next friend of G.H. 16 STIPULATION AND PROPOSED Plaintiffs, ORDER TO EXTEND TIME TO 17 v. RESPOND TO COMPLAINT AND TO 18 CONTINUE CASE MANAGEMENT UNIVERSITY OF CALIFORNIA BOARD OF CONFERENCE AND DEADLINES 19 REGENTS; UCSF BENIOFF CHILDREN'S HOSPITALS; MICHELLE EDNACOT, in her 20 individual and official capacity as the CHAMPS program manager at UCSF BENIOFF Date Action Filed: February 11, 2025 21 CHILDREN'S HOSPITAL OAKLAND; DR. Trial Date: None NICHOLAS HOLMES, in his individual and 22 official capacity as President of UCSF 23 BENIOFF CHILDREN'S HOSPITALS; and JANET REILLY, in her official capacity as 24 President of the UNIVERSITY OF CALIFORNIA BOARD 25 OF REGENTS. Defendants. 26 27

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

friend of G.H., and Defendants Children's Hospital & Research Center at Oakland ("BCH Oakland"), Michelle Ednacot, Dr. Nicholas Holmes, The Regents of the University of California ("The Regents") and Janet Reilly (collectively "Defendants"), each through their respective attorneys of record, hereby stipulate to extend the time for Defendants to respond to Plaintiffs' Complaint and continue the initial Case Management Conference currently scheduled for September 10, 2025, at 10:00 a.m., and corresponding deadlines. Said stipulation is made in accordance with Northern District Local Rules 6-2, 7-12, or 16-2(e) and is based upon the following facts and circumstances:

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

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

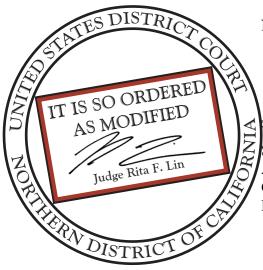
Case Management Event	Current Deadline	Proposed Deadline
BCH Oakland, Ms. Ednacot, Dr.	9/2/25	11/3/25
Holmes, The Regents and Ms.	712123	
Reilly's Response to the		
Complaint		
Deadline to file ADR	8/18/25	11/18/25
Certification.		
(See ADR L.R. 3)		
Deadline to meet and confer re:	8/18/25	11/18/25
initial disclosures, early		
settlement, ADR process		
selection, and discovery plan.		
(See F.R. Civ. P. 26(f))		
Deadline to make initial	9/2/25	11/3/25
disclosures.	712123	
(See F.R. Civ. P. 26(a)(1))		
Deadline to file Joint Case	9/2/25	11/3/25
Management Statement.	712123	
(See Standing Order for All		
Judges of the Northern District		
of California)		

0 0.0E - 04.000 DEL	D 1 O 4	ET - 1 00/4 0/0E	D 4 - C 4
Case 3:25-cv-01399-RFL	Document 34	Filed 08/13/25	Page 4 of 4

T 11 1 G 14		11/12/2025
Initial Case Management	9/10/25 10 a.m.	11/12/2023 11/10/25 10 a.m.
Conference	9/10/23 10 a.m.	11/10/23 10 a.m.

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

Respectfully submitted this 11th day of August 2025.



NARAYAN TRAVELSTEAD KU P.C.

/s/ Timothy 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

WILMER CUTLER PICKERING HALE AND DORR LLP

/s/ Felicia H. Ellsworth

Felicia H. Ellsworth*

Debo Adegbile*

Attorneys for Defendants

The Regents of the University of California and Lengt Roilly

Janet Reilly

*admitted pro hac vice

PACIFIC LEGAL FOUNDATION

/s/ Haley Dutch

Andrew R. Quinio, Esq. Haley Dutch*, Esq. Attorneys for Plaintiffs

*pro hac vice

2728

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26