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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 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 September 10, 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.
- 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. Nos. 16-17, 25.
- 26 6. Defendants BCH Oakland, Ms. Ednacot, and Dr. Holmes returned waivers of the service
27 of summons on May 30, 2025. Their responsive pleadings to Plaintiffs' Complaint are due by
28 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.

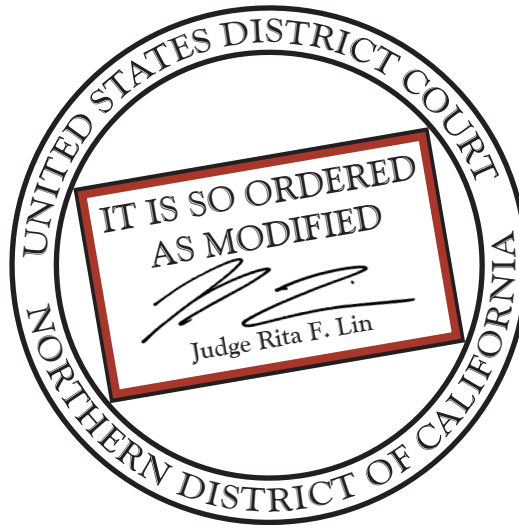
10. For the foregoing reasons, Plaintiffs, Defendants BCH Oakland, Ms. Ednacot, Dr. Holmes, The Regents, and Ms. Reilly jointly and respectfully request that the Court extend the deadlines as follows:

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

Initial Case Management Conference	9/10/25 10 a.m.	11/10/25 11/12/2025 10 a.m.
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IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

Respectfully submitted this 11th day of August 2025.



NARAYAN TRAVELSTEAD KU P.C.

/s/ Timothy Travelstead
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 Scott C. Ku, Esq.
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 Michelle Ednacot, and Dr. Nicholas Holmes

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/s/ Felicia H. Ellsworth
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/s/ Haley Dutch
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