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15 *Attorneys for Plaintiff G.H., a minor,*  
16 *by Rebecca Hooley*  
17 *\*pro hac vice*

18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**

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

22 Plaintiffs,

23 v.

24 UNIVERSITY OF CALIFORNIA BOARD OF  
25 REGENTS; UCSF BENIOFF CHILDREN'S  
26 HOSPITALS; MICHELLE EDNACOT, in her  
27 individual and official capacity as the CHAMPS  
28 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.

No. 4:25-cv-01399-RFL

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

1 Plaintiff, G.H., a minor, by REBECCA HOOLEY, the mother, legal guardian, and next  
2 friend of G.H., and Defendants University of California Board of Regents (“Regents”) and Janet  
3 Reilly, in her official capacity as President of University of California Board of Regents, each  
4 through their respective attorneys of record, hereby stipulate to extend the time for Defendants to  
5 respond to Plaintiffs’ Complaint and continue the initial Case Management Conference currently  
6 scheduled for May 14, 2025, at 1:30 p.m. PT, and corresponding deadlines. Said stipulation is made  
7 in accordance with Northern District Local Rules 6-2, 7-12, or 16-2(e) and is based upon the  
8 following facts and circumstances:

- 9 1. Plaintiffs filed the Complaint in this matter on February 11, 2025. Dkt. No. 1.
- 10 2. On February 12, 2025, the Court entered an Order setting Initial Case Management  
11 Conference and ADR deadlines. Dkt. No. 4.
- 12 3. On February 18, 2025, the Court entered orders rescheduling the Initial Case  
13 Management Conference to May 14, 2025, at 10:00 a.m. PT, with case management statements due  
14 by May 7, 2025. Deadlines for ADR compliance and discovery cutoff were unchanged, including  
15 for the parties to file ADR certifications and complete their Rule 26(f) conference by April 24,  
16 2025, and to make initial disclosures by May 8, 2025. Dkt. Nos. 12 and 13.
- 17 4. Defendants Regents and Ms. Reilly returned waivers of the service of summons on  
18 March 20, 2025. They are due to respond to Plaintiffs’ Complaint by May 13, 2025. Dkt. Nos. 16  
19 and 17.
- 20 5. Defendants UCSF Benioff Children’s Hospitals, Dr. Nicholas Holmes, and Michelle  
21 Ednacot (“Remaining Defendants”) have not yet accepted service of the Complaint or appeared in  
22 this matter despite Plaintiffs’ attempts to complete service of process. Plaintiffs’ efforts to serve  
23 remaining Defendants with the Complaint are ongoing, and Plaintiffs have until May 12, 2025, to  
24 complete service.
- 25 6. On April 16, 2025, counsel for the Regents and Ms. Reilly informed Plaintiffs’  
26 counsel that she would be in trial until April 25, 2025.
- 27 7. Between April 10 and April 17, 2025, counsel for the Regents, Ms. Reilly, and  
28 Plaintiffs met and conferred over email and agreed that extending the time for Defendants to

respond to the Complaint and continuing the case management conference and related deadlines would allow Plaintiffs to serve the remaining Defendants, give the remaining Defendants sufficient time to prepare for a Rule 26(f) and initial Case management conference, and provide the Regents and Ms. Reilly time to complete an initial internal fact-finding in response to Plaintiffs' claims. The extended time would further accommodate the trial schedule of counsel for the Regents and Ms. Reilly and the planned unavailability of Plaintiffs' counsel from May 26 to June 6, 2025.

8. This is the first request from the parties to extend deadlines in this matter.

9. For the foregoing reasons, Plaintiffs, Defendants UC Regents, and Ms. Reilly jointly and respectfully request that the Court extend the deadlines as follows:

Case Management Event	Current Deadline	Proposed Deadline
Response to Complaint by UC Regents and Ms. Reilly	5/13/25	6/13/25
Deadline to file ADR Certification. (See ADR L.R. 3)	4/24/25	6/18/25
Deadline to meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan. (See F.R. Civ. P. 26(f))	4/24/25	6/18/25
Deadline to make initial disclosures. (See F.R. Civ. P. 26(a)(1))	5/8/25	7/2/25
Deadline to file Joint Case Management Statement. (See Standing Order for All Judges of the Northern District of California)	5/7/25	7/2/25
Initial Case Management Conference	5/14/25 at 1:30 p.m. PT	7/9/25 at 1:30 p.m. PT

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

Respectfully submitted this 22nd day of April, 2025.

ANDREW R. QUINIO  
HALEY DUTCH\*

By /s/ Andrew R. Quinio  
ANDREW R. QUINIO

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No. 4:25-cv-01399-RFL

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

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 been  
3 shown to extend and continue such deadlines,

4 IT IS ORDERD that the deadline to respond to Plaintiffs' Complaint be extended and that  
5 the Case Management Conference and related Deadlines be re-scheduled as stipulated by the  
6 Parties (Dkt. No. 18.), except for the Case Management will be held at 10:00 AM on July 9, 2025.  
7 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

8  
9 Dated: April 24, 2025

  
\_\_\_\_\_  
Honorable Rita F. Lin, Judge  
United States District Court