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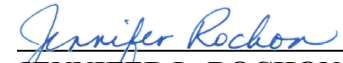
April 3, 2025

VIA ECF

The Honorable Jennifer L. Rochon
United States District Court
Southern District of New York
500 Pearl Street, Room 1920
New York, NY 10007

Dated: April 4, 2025
New York, New York

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge

Re: *Stern v. JPMorgan Chase & Co., et al., No. 25-cv-02097 (JLR)*

Dear Judge Rochon:

Pursuant to the Court’s Individual Rules and Practices (Section I.F), the parties in the above-referenced action jointly move for extension of the deadlines related to Defendants’ forthcoming motion to dismiss the complaint and for entry of an agreed-upon briefing schedule. In support, the parties respectfully state as follows:

1. On March 7, 2025, Plaintiffs filed the Complaint (ECF No. 1). The complaint brings claims under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”), regarding the cost of prescription-drug benefits available under the JPMorgan Chase Healthcare and Insurance Program for Active Employees and its component Medical Plan (the “Plan”) and the monitoring of the Plan’s pharmacy benefit manager.
2. Goodwin Procter LLP represents Defendants in the above-referenced action. Defendants were served on March 14 and just retained counsel to represent them in this matter.
3. Defendants’ response to the complaint is currently due on April 4, 2025. Defendants intend to file a motion to dismiss the complaint (the “Motion”).
4. Pursuant to Local Civil Rule 6.1, Plaintiffs’ opposition to the motion would be due within 14 days of the filing of Defendants’ motion to dismiss, and Defendants’ reply would be due 7 days thereafter.
5. The parties respectfully request extensions of these dates as follows:
 - a. Defendants’ Motion: June 3, 2025
 - b. Plaintiffs’ opposition to the Motion: July 25, 2025

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- c. Defendant's reply in support of the Motion: August 22, 2025
6. This request for an extension of time comports with Federal Rule of Civil Procedure 6(d), which provides that the Court may, for good cause, grant motions for extensions of time. Good cause exists to grant the present motion. As noted above, counsel for Defendants were recently engaged in connection with the above-referenced action and require time to investigate the allegations and review the documents referenced in the Complaint, in addition to preparing Defendants' forthcoming motion to dismiss. The additional time requested is particularly necessary given the length of the 97-page complaint and the complex nature of the factual allegations and claims at issue, which include multiple counts for breach of fiduciary duties and prohibited transactions under ERISA arising from a health plan covering hundreds of thousands of employees and millions of prescription-drug transactions. The extended briefing schedule likewise reflects the breadth of the lawsuit (which had been pled as a class action) and the significance of the issues involved.
 7. The parties have not previously requested an extension of time related to the complaint.

Respectfully submitted,

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