

**COHENMILSTEIN**

88 Pine Street, 14th Floor  
New York, NY 10005  
T:(212) 838-7797



100 Northern Avenue  
Boston, MA 02210  
T: (670) 570-1000

March 12, 2026

**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

Request GRANTED. Defendants' deadline to file their Answer to the Complaint is extended to **April 3, 2026**. Plaintiffs' deadline to file their reply pursuant to Federal Rule of Civil Procedure 7(a)(7) is likewise extended to **April 27, 2026**.

**SO ORDERED.**

Dated: March 12, 2026  
New York, New York

  
**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 1.F), the parties in the above-referenced action jointly move for extension of the deadlines related to Defendants' forthcoming Answer and Plaintiffs' forthcoming Reply to the Answer. In support, the parties respectfully state as follows:

1. The Complaint (ECF No. 1) brings claims under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), regarding the pricing of prescription-drug benefits available under the JPMorgan Chase Healthcare and Insurance Program for Active Employees and its component Medical Plan.
2. Defendants moved to dismiss the Complaint, and the Court granted in part and denied in part the motion to dismiss on March 9, 2026 (the "Motion to Dismiss Order," ECF No. 45).
3. In the Motion to Dismiss Order, the Court ordered that "Defendants shall file their Answer to the Complaint by March 25, 2026, and Plaintiffs shall file their reply pursuant to Federal Rule of Civil Procedure 7(a)(7) to address Defendants' invoked exemptions, if any, by April 8, 2026."
4. The parties respectfully request modest extensions of the deadlines to file the Answer and Reply as follows:
  - a. Defendants' Answer: April 3, 2026
  - b. Plaintiffs' Reply to the Answer: April 27, 2026.
5. 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. The additional time requested is necessary given the length of the 97-page complaint and the complex nature of the factual allegations and claims at issue (and Defendants' forthcoming

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Answer and anticipated affirmative defenses to those claims), which include counts for ERISA violations arising from a health plan covering hundreds of thousands of employees and millions of prescription-drug transactions.

6. The parties have not previously requested an extension of time related to either the Answer or Reply to the Answer.

Respectfully submitted,

/s/ Michael Eisenkraft (with permission)

Michael Eisenkraft  
Cohen Milstein Sellers & Toll PLLC  
88 Pine Street, 14th Floor  
New York, NY 10005  
212-838-7797  
meisenkraft@cohenmilstein.com

/s/ James O. Fleckner

James O. Fleckner, admitted *pro hac vice*  
GOODWIN PROCTER LLP  
100 Northern Avenue  
Boston, MA 02210  
617-570-1000  
jfleckner@goodwinlaw.com