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19 Physicians Anesthesiology of California, P.C.

20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA**

22 Anthem Blue Cross Life and Health
23 Insurance Company, a California
24 corporation; Blue Cross of California dba
25 Anthem Blue Cross, a California
26 corporation,

27 Plaintiffs,

28 v.

29 HaloMD, LLC; Alla Laroque; Bruin
30 Neurophysiology, P.C.; iNeurology,
31 P.C.; Los Angeles Neurological
32 Associates, P.C.; N Express, P.C.; North
33 American Neurological Associates,
34 P.C.; Sound Physicians Emergency
35 Medicine of Southern California, P.C.;
36 and Sound Physicians Anesthesiology of
37 California, P.C.,

38 Defendants.

Case No. 8:25-cv-01467-KES

**STIPULATED MOTION TO
EXTEND TIME TO RESPOND
TO THE COMPLAINT BY NO
MORE THAN 30 DAYS
[LOCAL RULE 8-3]**

Service waived: July 21, 2025; July
30, 2025; and August 4, 2025

Current response dates: September 19
2025; September 29, 2025; and
October 3, 2025

New response date: October 10, 2025

1 The parties, by and through undersigned counsel, stipulate pursuant to Local
2 Rule 8-3 as follows:

- 3 1. Plaintiffs' Complaint was filed on July 7, 2025. (Dkt. No. 1)
- 4 2. Defendants waived service of the Complaint on July 21, 2025 (Sound
5 Physicians Emergency Medicine of Southern California, P.C. and
6 Sound Physicians Anesthesiology of California, P.C. (together, "Sound
7 Physicians")), July 30, 2025 (Bruin Neurophysiology, P.C.; iNeurology,
8 P.C. and Los Angeles Neurological Associates, P.C), and August 4,
9 2025 (HaloMD, LLC and Alla Roque).
- 10 3. The current response dates are September 19, 2025 (Sound Physicians),
11 September 29, 2025 (Bruin Neurophysiology, P.C.; iNeurology, P.C.
12 and Los Angeles Neurological Associates, P.C), and October 3, 2025
13 (HaloMD, LLC and Alla Roque).
- 14 4. The new deadline to respond to the Complaint will be October 10, 2025
15 for all Defendants. This is an extension of no more than 30 days from
16 the current due date for all Defendants.

17
18 I, Tala Jayadevan, attest that all other signatories below, and on whose behalf
19 this filing is also submitted, concur in the filing's content and have authorized the
20 filing.
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Dated: September 18, 2025

MCDERMOTT WILL & SCHULTE LLP

By: /s/ Tala Jayadevan

Tala Jayadevan
Laura McLane
(*pro hac vice* application forthcoming)
Matthew Knowles
(*pro hac vice* application forthcoming)
Megan Corrigan
(*pro hac vice* application forthcoming)

*Attorneys for Defendants Sound Physicians
Emergency Medicine of Southern California,
P.C. and Sound Physicians Anesthesiology of
California, P.C.*

Dated: September 18, 2025

CROWELL AND MORING LLP

By: /s/ Amir Shlesinger

Amir Shlesinger
Alexander M. Lucas (appearing *pro hac vice*)
Jason Theodore Mayer (appearing *pro hac vice*)
Martin J. Bishop (appearing *pro hac vice*)

*Attorneys for Plaintiffs Anthem Blue Cross Life
and Health Insurance Company; and Blue Cross
of California dba Anthem Blue Cross*

Dated: September 18, 2025

POLSINELLI LLP

By: /s/ Gregory Jones

Gregory Jones
Noel Scott Cohen

*Attorneys for Defendant HaloMD LLC and
Alla LaRoque*

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Dated: September 18, 2025 **JONES DAY**

By: */s/ James Poth*
James Poth

*Attorneys for Defendants Bruin
Neurophysiology, P.C.; iNeurology, P.C.; Los
Angeles Neurological Associates, P.C.; N
Express, P.C.; and North American
Neurological Associates, P.C.*