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12 *Attorneys for Plaintiffs*

13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION
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16 ANTHEM BLUE CROSS LIFE AND
17 HEALTH INSURANCE COMPANY, a
18 California corporation; and BLUE
19 CROSS OF CALIFORNIA DBA
20 ANTHEM BLUE CROSS, a California
21 corporation,

22 Plaintiffs,

23 v.

24 PRIME HEALTHCARE SERVICES –
25 ST. FRANCIS, LLC; CHINO VALLEY
26 MEDICAL CENTER AUXILIARY;
27 PRIME HEALTHCARE SERVICES –
28 ENCINO HOSPITAL, LLC; PRIME
HEALTHCARE SERVICES –
GARDEN GROVE, LLC; PRIME
HEALTHCARE HUNTINGTON
BEACH, LLC; PRIME HEALTHCARE
LA PALMA, LLC; PRIME
HEALTHCARE SERVICES –
MONTCLAIR, LLC; PRIME
HEALTHCARE PARADISE VALLEY,
LLC; PRIME HEALTHCARE
SERVICES - SHASTA, LLC; PRIME
HEALTHCARE SERVICES –
SHERMAN OAKS, LLC; AND PRIME
HEALTHCARE ANAHEIM, LLC,

Defendants.

Case No. 8:26-cv-00023

**STIPULATION TO CONTINUE
HEARINGS ON MOTION TO
DISMISS, MOTION TO STRIKE,
AND MOTION TO STAY
DISCOVERY**

Judge: Honorable Monica Ramirez
Almadani

Date Action Filed: January 5, 2026

STIPULATION TO CONTINUE HEARINGS ON
MOTION TO DISMISS, MOTION TO STRIKE,
AND MOTION TO STAY DISCOVERY

8:26-cv-00023

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13 *Additional Counsel for Plaintiffs*
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1 Pursuant to L.R. 7-1, Plaintiffs ANTHEM BLUE CROSS LIFE AND
2 HEALTH INSURANCE COMPANY, and BLUE CROSS OF CALIFORNIA DBA
3 ANTHEM BLUE CROSS (“Plaintiffs”), and Defendants PRIME HEALTHCARE
4 SERVICES –ST. FRANCIS, LLC; CHINO VALLEY MEDICAL CENTER
5 AUXILIARY; PRIME HEALTHCARE SERVICES – ENCINO HOSPITAL, LLC;
6 PRIME HEALTHCARE SERVICES – GARDEN GROVE, LLC; PRIME
7 HEALTHCARE HUNTINGTON BEACH, LLC; PRIME HEALTHCARE LA
8 PALMA, LLC; PRIME HEALTHCARE SERVICES – MONTCLAIR, LLC;
9 PRIME HEALTHCARE PARADISE VALLEY, LLC; PRIME HEALTHCARE
10 SERVICES - SHASTA, LLC; PRIME HEALTHCARE SERVICES – SHERMAN
11 OAKS, LLC; AND PRIME HEALTHCARE ANAHEIM, LLC (the “Defendants”)
12 and, by and through their respective counsel of record, stipulate and agree to continue
13 the hearing on Defendants’ Motion to Dismiss (ECF No. 41), Motion to Strike (ECF
14 No. 42), and Motion to Stay Discovery Pending Resolution of Motion to Dismiss and
15 Motion to Strike (“Motion to Stay Discovery,” at ECF No. 51), as follows:

16 1. On January 5, 2026, Plaintiffs instituted this action by filing a Complaint
17 and Demand for Jury Trial (ECF No. 1);

18 2. On April 27, 2026, Defendants filed the Motion to Dismiss and Motion
19 to Strike, with a notice of hearing for both motions set for July 14, 2026 (ECF Nos.
20 41, 42);

21 3. On June 24, 2026, Defendants filed the Motion to Stay Discovery
22 Pending Resolution of the Motion to Dismiss and Motion to Strike, with a notice of
23 hearing set for August 11, 2026 (“Motion to Stay,” at ECF No. 51);

24 4. On July 10, 2026, the Court, on its own motion, continued the hearings
25 on Defendants’ Motion to Dismiss and Motion to Strike from July 14 to August 11,
26 2026 (ECF No. 55);

1 5. On August 7, 2026, the Court, on its own motion, continued the hearings
2 on Defendants' Motion to Dismiss, Motion to Strike, and Motion to Stay Discovery
3 from August 11 to August 13, 2026 (ECF No. 61);

4 6. Plaintiffs and Defendants have counsel who will be traveling from out
5 of state to participate in the hearings on Defendants' Motion to Dismiss, Motion to
6 Strike, and Motion to Stay Discovery;

7 7. Plaintiffs' out of state counsel has a conflict such that counsel is unable
8 to attend the hearings on August 13, 2026;

9 8. Plaintiffs and Defendants have conferred and are available to participate
10 in the hearings on Defendants' Motion to Dismiss, Motion to Strike, and Motion to
11 Stay Discovery on August 24 or 25, 2026, or on September 23 (in the morning) or
12 24, 2026;

13 9. Defendants have no objection to the short proposed continuance of the
14 hearings on Defendants' Motion to Dismiss, Motion to Strike, and Motion to Stay
15 Discovery;

16 10. Plaintiffs contend there is good cause to continue the hearings on
17 Defendants' Motion to Dismiss, Motion to Strike, and Motion to Stay Discovery to
18 ensure that the counsel who have been preparing for the hearings can participate;

19 11. Plaintiffs contend that no party will be prejudiced by the short proposed
20 continuance, as Defendants have no objection;

21 THEREFORE, the Parties hereby stipulate, agree, and respectfully request that
22 the Court enter an Order continuing the hearings on Defendants' Motion to Dismiss,
23 Motion to Strike, and Motion to Stay Discovery to August 24 or 25, 2026, or on
24 September 23 (in the morning) or 24, 2026.

1 Dated: August 10, 2026

CROWELL & MORING LLP

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3 By: /s/ Jason T. Mayer

4 Amir Shlesinger

Jennie VonCannon

5 Jason T. Mayer (*pro hac vice*)

Martin J. Bishop (*pro hac vice*)

6 Alexandra M. Lucas (*pro hac vice*)

Jed Wulfekotte (*pro hac vice*)

7
8
9 Dated: August 10, 2026

JONES DAY

10
11 By: /s/ B. Kurt Copper (with permission)

12 James L. Poth

David M. DeVito

13 B. Kurt Copper

Nicholas J. Rawls

14 *Attorneys for Defendants*

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STIPULATION TO CONTINUE HEARINGS ON
MOTION TO DISMISS, MOTION TO STRIKE,
AND MOTION TO STAY DISCOVERY

SIGNATURE CERTIFICATION

Pursuant to Rule 5-4.3.4(a)(2) of the Local Civil Rules of the United States District Court for the Central District of California, I hereby certify that the content of this document is acceptable to all signatories, and that I have obtained their authorization to affix electronic signatures to this document.

Dated: August 10, 2026

CROWELL & MORING LLP

By: /s/ Jason T. Mayer

Amir Shlesinger

Jennie VonCannon

Laura Schwartz

Jason T. Mayer (*pro hac vice*)

Martin J. Bishop (*pro hac vice*)

Alexandra M. Lucas (*pro hac vice*)

Jed Wulfekotte (*pro hac vice*)

Attorneys for Plaintiffs

*Anthem Blue Cross Life and Health
Insurance Company and Blue Cross of
California dba Anthem Blue Cross*

STIPULATION TO CONTINUE HEARINGS ON
MOTION TO DISMISS, MOTION TO STRIKE,
AND MOTION TO STAY DISCOVERY

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8 UNITED STATES DISTRICT COURT
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11 ANTHEM BLUE CROSS LIFE AND
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13 California corporation; and BLUE
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ANTHEM BLUE CROSS, a California
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SHERMAN OAKS, LLC; AND PRIME
HEALTHCARE ANAHEIM, LLC,

26 Defendants.
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Case No. 8:26-cv-00023

**[PROPOSED] ORDER
GRANTING STIPULATION TO
CONTINUE HEARING ON
MOTION TO DISMISS, MOTION
TO STRIKE, AND MOTION TO
STAY DISCOVERY**

Judge: Honorable Monica Ramirez
Almadani

Date Action Filed: January 5, 2026

[PROPOSED] ORDER GRANTING
STIPULATION TO CONTINUE HEARINGS
ON PENDING MOTIONS

8:26-cv-00023

1 On August 10, 2026, the Parties filed a Stipulation to Continue the Hearings
2 on Defendants' Motion to Dismiss (ECF No. 41), Motion to Strike (ECF No. 42),
3 and Motion to Stay Discovery Pending Resolution of Motion to Dismiss and Motion
4 to Strike ("Motion to Stay Discovery," at ECF No. 51), proposing alternative dates
5 for the hearings on August 24 or 25, 2026, or on September 23 (in the morning) or
6 24, 2026;

7 The Court, having considered the Stipulation, and finding good cause therefor,
8 hereby ORDERS as follows:

- 9 1. The hearings on Defendants' Motion to Dismiss, Motion to Strike, and
10 Motion to Stay Discovery current set for August 13, 2026, are hereby
11 continued to _____, 2026.
- 12 2. The hearings shall proceed IN PERSON as to all parties in Courtroom
13 9B of the Ronald Reagan Federal Building & United States Courthouse,
14 411 West 4th Street, Santa Ana, California 92701.

15 IT IS SO ORDERED.

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17 Dated:

18 HON. MÓNICA RAMÍREZ ALMADANI
19 UNITED STATES DISTRICT JUDGE
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