

Jacob Gardener (*pro hac vice*), jgardener@wmhwlaw.com
Walden Macht Haran & Williams LLP
250 Vesey Street, 27th Floor
New York, NY 10281
(212) 225-2030

Steve Cohen (*pro hac vice*), Steve@PollockCohen.com
Pollock Cohen LLP
111 Broadway, Suite 1804
New York, NY 10006
(646) 517-0542

Ben Travis (CA Bar No. 305641), ben@bentravislaw.com
12481 High Bluff Drive, Suite 300
San Diego, CA 92130
(619) 353-7966

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JENNIFFER ROIZ, CLAUDINE CASTILLO,
CANDYCE MARTO, and KEVIN MAEDEL on
behalf of themselves and all others similarly
situated,

Plaintiffs,

-against-

CALIFORNIA PHYSICIANS' SERVICE DBA
BLUE SHIELD OF CALIFORNIA, MAGELLAN
HEALTH, INC., MAGELLAN HEALTHCARE,
INC., and HUMAN AFFAIRS
INTERNATIONAL OF CALIFORNIA,

Defendants.

Case No.: 3:25-cv-09978-WHO

**STIPULATION AND
[PROPOSED]
ORDER TO EXTEND TIME
FOR PLAINTIFFS TO AMEND
COMPLAINT AND TO SET
BRIEFING SCHEDULE FOR
MOTIONS TO DISMISS**

STIPULATION AND [PROPOSED] ORDER
TO EXTEND TIME FOR PLAINTIFFS TO AMEND COMPLAINT AND
TO SET BRIEFING SCHEDULE FOR MOTIONS TO DISMISS
Case No. 3:25-cv-09978-WHO

1 Plaintiffs JENNIFER ROIZ, CLAUDINE CASTILLO, CANDYCE MARTO, and KEVIN
2 MAEDEL (collectively, “Plaintiffs”) and Defendants CALIFORNIA PHYSICIANS’ SERVICE
3 DBA BLUE SHIELD OF CALIFORNIA (“Defendant Blue Shield”), MAGELLAN HEALTH,
4 INC., MAGELLAN HEALTHCARE, INC., and HUMAN AFFAIRS INTERNATIONAL OF
5 CALIFORNIA (collectively, the “Magellan Defendants”, with Defendant Blue Shield,
6 “Defendants”, and with Plaintiffs, the “Parties”), by and through their undersigned counsel, and
7 pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, hereby agree and stipulate that good cause
8 exists to request an Order from the Court to extend Plaintiffs’ deadline to amend the Complaint,
9 to enter a briefing schedule as set forth below on Defendants’ anticipated Motions to Dismiss, and
10 to continue the Initial Case Management Conference and the hearing on Defendants’ respective
11 Motions to Dismiss, as follows:

12 WHEREAS, Plaintiffs filed their Complaint on November 24, 2025 (Dkt. No. 6);

13 WHEREAS, on January 5, 2026, pursuant to Local Civil Rule 6-1(a), Plaintiffs and
14 Defendant Blue Shield stipulated to an extension of time for Defendant Blue Shield to answer or
15 otherwise respond to the Complaint until February 17, 2026 (Dkt. No. 14);

16 WHEREAS, on February 9, 2026, pursuant to Local Civil Rule 6-1(a), Plaintiffs and the
17 Magellan Defendants stipulated to an extension of time for the Magellan Defendants to answer or
18 otherwise respond to the Complaint until February 24, 2026 (Dkt. No. 32);

19 WHEREAS, Defendant Blue Shield moved to dismiss the Complaint on February 17, 2026
20 (Dkt. No. 41);

21 WHEREAS, the Magellan Defendants moved to dismiss the Complaint on February 24,
22 2026 (Dkt. No. 43);

23 WHEREAS, the Initial Case Management Conference and hearings on Defendants’
24 respective Motions to Dismiss are presently scheduled for April 29, 2026 (Dkt. No. 44);

25 WHEREAS, pursuant to Federal Rule of Civil Procedure 15(a)(1)(B), Plaintiffs’ deadline
26 to amend the Complaint is presently March 10, 2026;

27 WHEREAS, Defendants have agreed to an extension of time for Plaintiffs to amend their
28 Complaint, making Plaintiffs’ Amended Complaint due on or before March 24, 2026;

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1 WHEREAS, Plaintiffs have agreed to an extension of time for Defendants to respectively
2 answer or otherwise respond to the Amended Complaint, making Defendants' responses now due
3 on or before May 5, 2026, notwithstanding any default deadlines set forth in the Federal Rules of
4 Civil Procedure or the Local Rules;

5 WHEREAS, Defendants have agreed that, in the event they file motions in response to
6 Plaintiffs' Amended Complaint on or before May 5, 2026, Plaintiffs' deadline to file their
7 oppositions to Defendants' respective motions shall be extended to and include June 16, 2026,
8 notwithstanding any default deadlines set forth in the Federal Rules of Civil Procedure or the Local
9 Rules;

10 WHEREAS, Plaintiffs have agreed that, in the event they file oppositions in response to
11 Defendants' motions on or before June 16, 2026, Defendants' deadline to file their respective
12 replies shall be extended to and include July 7, 2026, notwithstanding any default deadlines set
13 forth in the Federal Rules of Civil Procedure or the Local Rules;

14 WHEREAS, in light of the anticipated length of the Amended Complaint and the number
15 of legal issues (the Complaint is 60 pages long and asserts twelve causes of action), there is good
16 cause to extend the deadlines as set forth above;

17 WHEREAS, this is the Parties' first request for an extension of time to file an amended
18 complaint and set a briefing schedule;

19 WHEREAS, in the event the Court adopts the deadlines set forth above, the Parties believe
20 it would be a waste of judicial and party resources for the Court and the Parties to conduct the
21 Initial Case Management Conference on April 29, 2026;

22 WHEREAS, for the convenience of the Court, the Parties wish to continue the Initial Case
23 Management Conference so that it takes place on August 7, 2026, or at least 30 days after
24 Defendants' reply briefs in support of a motion to dismiss are due to be filed.

25 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties,
26 through their undersigned counsel, and the Parties respectfully request that the Court enter an
27 Order, as follows:

- 28 1. Plaintiffs shall have until and including March 24, 2026, to amend the Complaint;

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2. Defendants shall have until and including May 5, 2026, to answer or otherwise respond to the Amended Complaint;
3. In the event Defendants file motions in response to the Amended Complaint, Plaintiffs' deadline to file their oppositions to Defendants' respective motions shall be extended to and including June 16, 2026;
4. Defendants' deadline to file their respective responses shall be extended to and including July 7, 2026;
5. The hearing on Defendants' respective motions shall be scheduled for August 7, 2026; and
6. The Initial Case Management Conference shall be continued until August 7, 2026.

Dated: March 4, 2026

/s/ Jacob Gardener
Jacob Gardener*
250 Vesey St., 27th Floor
New York, NY 10281
(212) 335-2965
jgardener@wmhwlaw.com

Steve Cohen*
Pollock Cohen LLP
111 Broadway, Suite 1804
New York, NY 10006
(646) 517-0542
Steve@PollockCohen.com

Ben Travis (CA Bar No. 305641)
12481 High Bluff Drive, Suite 300
San Diego, CA 92130
(619) 353-7966
ben@bentravislaw.com

**Admitted pro hac vice
Counsel for Plaintiffs Jenniffer Roiz,
Claudine Castillo, Candyce Marto, and Kevin
Maedel*

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/s/ Kendall Waters
Kendall Waters
Jason Wu
Kimberly Klinsport
One Market Plaza
55 Spear Street Tower
Suite 1900
San Francisco, CA 94105
(415) 434-4484
jwu@foley.com
*Counsel for California Physicians' Service
dba Blue Shield of California*

/s/ Steven Cady
Steven Cady
Williams & Connolly LLP
680 Maine Avenue SW
Washington, DC 20024
(202) 434-5321
scady@wc.com
*Counsel for Magellan Health, Inc., Magellan
Healthcare, Inc., and Human Affairs
International of California*

PURSUANT TO STIPULATION, IT IS SO ORDERED

Date:

Honorable William H. Orrick
U.S. District Judge

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**UNITED STATES DISTRICT COURT
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behalf of themselves and all others similarly
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INTERNATIONAL OF CALIFORNIA,

Defendants.

Case No.: 3:25-cv-09978-WHO

**DECLARATION OF JACOB
GARDENER IN SUPPORT OF
STIPULATION AND
[PROPOSED]
ORDER TO EXTEND TIME
FOR PLAINTIFFS TO AMEND
COMPLAINT AND TO SET
BRIEFING SCHEDULE FOR
MOTIONS TO DISMISS**

1 I, Jacob Gardener, hereby declare:

2 1. I am an attorney licensed to practice law in the State of New York and admitted *pro*
3 *hac vice* to appear before this Court in this action. I am a partner with the firm of Walden Macht
4 Haran & Williams LLP, attorneys of record for Plaintiffs Jenniffer Roiz, Claudine Castillo,
5 Candyce Marto, and Kevin Maedel (collectively, “Plaintiffs”). I state facts in this declaration of
6 my own knowledge.

7 2. Pursuant to Civil Local Rule 6-2(a), I submit this Declaration in support of the
8 Stipulation to Extend Time for Plaintiffs to Amend the Complaint and to Set a Briefing Schedule
9 on the Motions to Dismiss.

10 3. Plaintiffs filed their Complaint on November 24, 2025. (Dkt. No. 6.)

11 4. On January 5, 2026, Plaintiffs and Defendant California Physicians’ Service dba
12 Blue Shield of California (“Defendant Blue Shield”), pursuant to Local Civil Rule 6-1(a),
13 stipulated to an extension of time for Defendant Blue Shield to answer or otherwise respond to
14 the Complaint until February 17, 2026. (Dkt. No. 14.)

15 5. On February 9, 2026, Plaintiffs and Magellan Health, Inc., Magellan Healthcare,
16 Inc., and Human Affairs International of California (collectively, the “Magellan Defendants”),
17 pursuant to Local Civil Rule 6-1(a), stipulated to an extension of time for the Magellan
18 Defendants to answer or otherwise respond to the Complaint until February 24, 2026. (Dkt. No.
19 32.)

20 6. Defendant Blue Shield moved to dismiss the Complaint on February 17, 2026, and
21 the Magellan Defendants moved to dismiss the Complaint on February 24, 2026. (Dkt. Nos. 41,
22 43.)

23 7. The Initial Case Management Conference and hearing on Defendants’ respective
24 Motions to Dismiss are presently scheduled for April 29, 2026. (Dkt. No. 44.)

25 8. Plaintiffs’ deadline to amend the Complaint is presently March 10, 2026. *See* Fed.
26 R. Civ. P. 15(a)(1)(B).

27 9. The parties have stipulated to an extended deadline for Plaintiffs to amend the
28 Complaint and a briefing schedule on Defendants’ respective Motions to Dismiss as follows:

DECL. of J. GARDENER ISO STIPULATION
TO EXTEND TIME FOR PLAINTIFFS TO AMEND COMPLAINT AND
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- a. Plaintiffs shall have until and including March 24, 2026, to amend the Complaint;
- b. Defendants shall have until and including May 5, 2026, to answer or otherwise respond to the Amended Complaint;
- c. In the event Defendants file motions in response to the Amended Complaint, Plaintiffs' deadline to file their oppositions to Defendants' respective motions shall be extended to and including June 16, 2026; and
- d. Defendants' deadline to file their respective responses shall be extended to and including July 7, 2026.

10. This is the Parties' first request for an extension of time.

11. The Parties respectfully seek this extension in light of the anticipated length of the Amended Complaint and the number of legal issues (the Complaint is 60 pages long and asserts twelve causes of action).

12. Should the Court grant Plaintiffs' extension to amend the Complaint and adopt the Parties' stipulated briefing schedule, the Parties request that the hearing on Defendants' respective Motions to Dismiss be scheduled for August 7, 2026, or at least 30 days after Defendants' reply briefs in support of a motion to dismiss are due to be filed.

13. Should the Court schedule the hearing on August 7, 2026, or at least 30 days after Defendants' reply briefs in support of a motion to dismiss are due to be filed, the Parties request that the Initial Case Management Conference presently scheduled for April 29, 2026, be continued until the date of the hearing on Defendants' respective Motions to Dismiss. It is the Parties' position that conducting the Initial Case Management Conference and the hearing on the same day will conserve judicial and party resources.

14. If the Court grants Plaintiffs' extension to amend the Complaint, adopts the proposed briefing schedule, and schedules the hearing on Defendants' Motions to Dismiss and the Initial Case Management Conference on August 7, 2026, or at least 30 days after Defendants' reply briefs in support of a motion to dismiss are due to be filed, the only effect on the schedule for this matter will be the continuation of the Initial Case Management Conference. The filing of

1 the Amended Complaint will moot the hearing on Defendants’ Motions to Dismiss the Complaint,
2 and the only other conference presently scheduled is the Initial Case Management Conference.

3 I declare under penalty of perjury that the foregoing is true and correct. Executed on March
4 4, 2026, at New York, New York.

5 /s/ Jacob Gardener
6 Jacob Gardener
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28 DECL. of J. GARDENER ISO STIPULATION
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