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15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**

17 UNITED STATES OF AMERICA ex rel.  
18 RONDA OSINEK,  
19  
20 Plaintiff,  
21  
22 v.  
23 KAISER PERMANENTE, et al.,  
24  
25 Defendants.

Case No. 3:13-cv-03891-EMC

**STIPULATION TO EXTEND DATE OF  
HEARING OF DEFENDANTS' MOTIONS  
TO DISMISS; ~~PROPOSED~~ ORDER**

Courtroom: 5, 17th Floor  
Judge: Hon. Edward M. Chen

(CAPTION CONTINUED)

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UNITED STATES OF AMERICA ex rel.  
GLORYANNE BRYANT and VICTORIA  
HERNANDEZ,  
  
Plaintiff,  
  
v.  
  
KAISER PERMANENTE, INC., et al,  
  
Defendants.

Case No. 3:18-cv-01347-EMC  
  
**STIPULATION TO EXTEND DATE  
OF HEARING OF DEFENDANTS'  
MOTIONS TO DISMISS;  
~~PROPOSED~~ ORDER**  
  
Courtroom: 5, 17th Floor  
Judge: Hon. Edward M. Chen

UNITED STATES OF AMERICA ex rel.  
JAMES M. TAYLOR,  
  
Plaintiff,  
  
v.  
  
KAISER PERMANENTE, INC., et al.,  
  
Defendants.

Case No. 3:21-cv-03894-EMC  
  
**STIPULATION TO EXTEND DATE  
OF HEARING OF DEFENDANTS'  
MOTIONS TO DISMISS;  
~~PROPOSED~~ ORDER**  
  
Courtroom: 5, 17th Floor  
Judge: Hon. Edward M. Chen

1 Pursuant to Civil Local Rule 7-12; Relator James M. Taylor, the United States, Relators  
2 Gloryanne Bryant, and Victoria Hernandez (collectively, “Plaintiffs”) and Defendants Kaiser  
3 Foundation Health Plan, Inc.; Kaiser Foundation Health Plan of Colorado; The Permanente  
4 Medical Group, Inc.; Southern California Permanente Medical Group; Colorado Permanente  
5 Medical Group, P.C.; Kaiser Foundation Hospitals; Kaiser Foundation Health Plan of Georgia,  
6 Inc.; Kaiser Foundation Health Plan of the Mid-Atlantic States; Kaiser Foundation Health Plan of  
7 the Northwest; Kaiser Foundation Health Plan of Washington; The Southeast Permanente  
8 Medical Group; Hawaii Permanente Medical Group; Mid-Atlantic Permanente Medical Group;  
9 Group Health Permanente (n/k/a Washington Permanente Medical Group, P.C.); and Northwest  
10 Permanente, P.C. (collectively, “Defendants”) hereby stipulate and request as follows:

11 1. On November 14, 2022, the Court issued orders on Defendants’ motions to  
12 dismiss Plaintiffs’ complaints, providing Plaintiffs with leave to file amended complaints by  
13 December 12, 2022 and setting Defendants’ deadline to respond for January 3, 2023. Dkt. Nos.  
14 223, 225, 226.

15 2. Plaintiffs filed three amended complaints on December 12, 2022. Dkt. Nos. 238,  
16 239, 240.

17 3. On December 21, 2022, all parties entered into a stipulation to amend the default  
18 briefing schedule, resulting in a proposed hearing date of April 20, 2023. The Court entered an  
19 order granting that stipulation on the same day. Dkt. Nos. 242, 243.

20 4. A conflict with the April 20, 2023 hearing date has since arisen for Relator  
21 Taylor’s counsel. Members of his legal team will now be outside of the country on that date. As a  
22 result, Relator Taylor requests that the hearing date for Defendants’ motions to dismiss Plaintiffs’  
23 amended complaints be extended by fourteen (14) days to May 4, 2023.

24 5. Relator Taylor does not seek an extension to any other deadlines in the previously  
25 ordered briefing schedule for Defendants’ motions to dismiss Plaintiffs’ amended complaints.  
26 Dkt. No. 243.

27 6. Counsel for all parties have conferred about Relator Taylor’s request, and no  
28 parties oppose the request.

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7. Relator Taylor has not previously requested an extension.

IT IS SO STIPULATED.

Dated: January 11, 2023

Respectfully submitted,

By:

/s/ Michael Ronickher

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**ATTESTATION**

Pursuant to Local Rule 5-1(h)(3), I hereby attest that the other signatories listed, on whose behalf this filing is submitted, concur in the filing’s content and have authorized the filing.

DATED: January 11, 2022

/s/ Michael Ronickher  
Michael Ronickher

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~~PROPOSED~~ ORDER

Pursuant to stipulation and with good cause shown, the hearing date for Defendants' motions to dismiss Plaintiffs' amended complaints is extended from April 20, 2023 to May 4, 2023.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: January 13, 2023



HONORABLE EDWARD M. CHEN  
UNITED STATES DISTRICT JUDGE