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12
13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15

16 UNITED STATES OF AMERICA ex rel. RONDA
17 OSINEK,

18 Plaintiff,

19 v.

20 KAISER PERMANENTE, et al.,

21 Defendants.
22

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

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
BRIEFING SCHEDULE ON
DEFENDANTS' MOTION TO COMPEL**

23
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25 (CAPTION CONTINUED)
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27
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1 UNITED STATES OF AMERICA ex rel.
2 GLORYANNE BRYANT and VICTORIA
3 HERNANDEZ,

4 Plaintiff,

5 v.

6 KAISER PERMANENTE, et al,

7 Defendants.

Case No. 3:18-cv-01347-EMC

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
BRIEFING SCHEDULE ON
DEFENDANTS' MOTION TO COMPEL**

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9
10 UNITED STATES OF AMERICA ex rel.
11 JAMES M. TAYLOR,

12 Plaintiff,

13 v.

14 KAISER PERMANENTE, et al.,

15 Defendants.

Case No. 3:21-cv-03894-EMC

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
BRIEFING SCHEDULE ON
DEFENDANTS' MOTION TO COMPEL**

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1 Defendants Kaiser Foundation Health Plan, Inc., Kaiser Foundation Health Plan of Colorado,
 2 The Permanente Medical Group, Inc., Southern California Permanente Medical Group, and Colorado
 3 Permanente Medical Group, P.C. (collectively, “Defendants”) and the United States of America
 4 (“Plaintiff”) (collectively, “the parties”) hereby stipulate and request as follows:

5 1. On July 31, 2024, the parties filed a Discovery Letter Brief regarding Plaintiff’s
 6 assertions of the deliberative process privilege. *See* Dkt. No. 344.

7 2. At a hearing on August 1, 2024, the Court requested full briefing on the Discovery Letter
 8 Brief in the form of a motion to compel from Defendants. The Court noted that, in its portion of the
 9 Discovery Letter Brief, Plaintiff identified four categories of documents withheld on the basis of the
 10 deliberative process privilege. The Court directed Defendants, as part of the briefing, to identify ten
 11 documents within each of the four categories to serve as a sample for the Court’s consideration when
 12 deciding the motion. Plaintiff will then submit those documents *in camera* to the Court for review.

13 3. Following the hearing on August 1, 2024, the Court issued a Minute Order directing the
 14 parties to “meet and confer and file a stipulation setting forth a briefing schedule, with a hearing to be
 15 set no earlier than November, as to the Discovery Letter Brief” filed on July 31, 2024. Dkt. No. 345.

16 4. Pursuant to the Court’s Minute Order, the parties hereby stipulate to and request that the
 17 Court enter an order setting the following briefing schedule:
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Event	Proposed Deadline
Deadline for Defendants to file their motion to compel production of documents withheld by Plaintiff on grounds of the deliberative process privilege	September 13, 2024
Deadline for Plaintiff’s opposition to Defendants’ motion	October 11, 2024
Deadline for Defendants’ reply in support of the motion	October 25, 2024
Plaintiff’s sample documents shall be lodged with the court. Sample documents shall be emailed to JCSPO@cand.uscourts.gov.	October 25, 2024

Event	Proposed Deadline
Hearing on Defendants’ motion	November 6, 2024 at 9:30 a.m.

Dated: August 6, 2024

Respectfully submitted,

/s/ K. Lee Blalack, II

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United States Department of Justice
 Civil Division
 Commercial Litigation Branch

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2 *Attorneys for the United States of America*

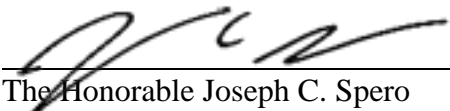
3 * In compliance with Civil Local Rule 5-1(i)(3), the filer attests that all signatories have concurred in the
4 filing of this document.

5 **[PROPOSED] ORDER**

6 Pursuant to stipulation, the above-referenced briefing schedule proposed by the parties regarding
7 the Discovery Letter Brief, Dkt. No. 344, is hereby adopted **as modified**.

8 **IT IS SO ORDERED AS MODIFIED.**

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10 Dated: August 7, 2024

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13 The Honorable Joseph C. Spero
14 United States Magistrate Judge