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

UNITED STATES OF AMERICA ex rel.
 RONDA OSINEK,

Plaintiff,

v.

KAISER PERMANENTE, et al.,

Defendants.

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

**JOINT STIPULATION TO STAY
 PROCEEDINGS PENDING
 SETTLEMENT DISCUSSIONS AND
~~PROPOSED~~ ORDER**

(CAPTION CONTINUED)

1 Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, Plaintiff the United States of
2 America; Defendants Kaiser Foundation Health Plan, Inc. (“KFHP”), Kaiser Foundation Health
3 Plan of Colorado (“KFHP-CO”), The Permanente Medical Group, Inc. (“TPMG”), Southern
4 California Permanente Medical Group (“SCPMG”), Colorado Permanente Medical Group, P.C.
5 (“CPMG”), Kaiser Foundation Health Plan of the Northwest (“KFHP-NW”), Kaiser Foundation
6 Hospitals (“KFH”), and Northwest Permanente, P.C. (“NW PMG”) (collectively, “Defendants”);
7 and Relators James Taylor, M.D., Gloryanne Bryant, and Victoria Hernandez hereby recite and
8 stipulate as follows:

9 WHEREAS, the Court, by Order dated February 15, 2022 [Dkt. No. 184], issued a Case
10 Management and Pretrial Order setting forth the case schedule, providing a general fact discovery
11 deadline of March 25, 2024.

12 WHEREAS, the Court, by Order dated April 3, 2024 [Dkt. No. 332], issued an Amended
13 Case Management and Pretrial Order setting forth the case schedule, providing a general fact
14 discovery deadline of July 15, 2025.

15 WHEREAS, the Court, by Order dated August 15, 2025 [Dkt. No. 409], issued an
16 Amended Case Management and Pretrial Order setting forth the case schedule, providing a
17 general fact discovery deadline of November 17, 2025.

18 WHEREAS, the parties have completed substantial discovery.

19 WHEREAS, the parties have made substantial progress in reaching an agreement to fully
20 resolve Case Nos. 3:13-cv-03891-EMC, 3:18-cv-01347-EMC, and 3:21-cv-03894-EMC and wish
21 to continue those discussions.

22 WHEREAS, the parties agree that, subject to the approval of the Court, the most efficient
23 course of action, which will conserve both the parties’ and the Court’s resources, is to stay all
24 deadlines in this matter, including, without limitation, all deadlines regarding discovery, so that
25 the parties can work to finalize the settlement.

26 NOW, THEREFORE, the parties jointly request the Court stay proceedings and all case
27 deadlines for ninety (90) days to continue discussions regarding potential options for resolving
28 the case and, to the extent the parties have not reached a resolution at the end of the stay, the

1 parties agree to submit a revised Case Management Order for consideration by the Court on or
2 before January 15, 2026.

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1 IT IS SO STIPULATED.

2 DATED: October 16, 2025

Respectfully submitted,

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/s/ K. Lee Blalack, II
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and Victoria M. Hernandez*


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

~~PROPOSED~~ ORDER

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PURSUANT TO STIPULATION, IT IS SO ORDERED that Case Nos. 3:13-cv-03891-EMC, 3:18-cv-01347-EMC, and 3:21-cv-03894-EMC are stayed for ninety (90) days. If the parties have not reached a resolution at the end of the stay, the parties shall submit a revised proposed Case Management Order on or before January 15, 2026.

Dated: October 17, 2025



The Honorable Edward M. Chen
United States District Judge