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JS-6

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15 Attorneys for Plaintiff Annette Weil
 16 and the Putative Class

17 UNITED STATES DISTRICT COURT
 18 CENTRAL DISTRICT OF CALIFORNIA

19 ANNETTE WEIL, *et al.*,
 20
 21 Plaintiffs,
 22
 23 v.
 24 CIGNA HEALTH AND LIFE
 25 INSURANCE COMPANY, *et al.*,
 26
 27 Defendants.

Case No. 2:15-cv-07074-MWF-JPR

**STIPULATION BETWEEN
 PLAINTIFF AND CIGNA
 DEFENDANTS AND ORDER TO
 STAY CASE PENDING SETTLEMENT
 DISCUSSIONS AND TO EXTEND TIME
 TO COMPLETE
 CLASS DISCOVERY IF
 SETTLEMENT IS NOT ACHIEVED**

1 Plaintiff and defendants Cigna Health and Life Insurance Co., Cigna Health
2 Management, Inc., and Cigna Behavioral Health, Inc. (together, "Cigna") hereby
3 respectfully request that the Court, as to Plaintiff's claims against Cigna, (i) stay the
4 Stipulated Case Schedule [Docket No. 45] for a period of 90 days to permit
5 Plaintiff and Cigna to continue their settlement discussions; and (ii) extend all
6 deadlines in the Stipulated Case Schedule by 90 days to allow Plaintiff and Cigna to
7 complete class certification discovery and motions in the event that they are unable
8 to resolve this case. In support of the request, Plaintiff and Cigna jointly stipulate
9 that:

10 1. Plaintiff Annette Weil filed this class action on her own behalf and on
11 behalf of others similarly situated on September 8, 2015.

12 2. The defendants answered the complaint on November 2, 2015.

13 3. On January 14, 2016, the Court entered the Stipulated Case Schedule.

14 4. Plaintiff and Cigna have been engaged in productive settlement
15 discussions and are confident they will be able to reach agreement on a proposed
16 resolution to submit to the Court for preliminary approval. These parties believe a
17 stay in the discovery and briefing deadlines as to Plaintiff's claims against Cigna
18 will allow them to focus on the ongoing settlement discussions and avoid the
19 needless expenditure of their, and the Court's, resources.

20 5. Accordingly, Plaintiff and Cigna request that the Court, as to
21 Plaintiff's claims against Cigna: (i) stay this case for a period of 90 days to enable
22 them either to reach a resolution or notify the Court that they are unable to do so;
23 (ii) extend all dates in the Stipulated Case Schedule by 90 days, such that, most
24 immediately, the deadline for class certification discovery for Plaintiff and Cigna
25 would be July 28, 2016, and the deadline for Plaintiff's motion for class
26 certification against Cigna would be August 25, 2016; and (iii) direct that Plaintiff
27 and Cigna, on or before June 15, 2016, update the Court on the status of settlement
28 negotiations.

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Dated: April 19, 2016

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Respectfully submitted,

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By: /s/ Andrew N. Goldfarb
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ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that concurrence in the filing of this document has been obtained from the other signatories.

Dated: April_19, 2016

/s/ Andrew N. Goldfarb
Andrew N. Goldfarb

IT IS SO ORDERED AND APPROVED.



DATED: May 3, 2016

Hon. Michael W. Fitzgerald
United States District Judge