

1 Annick M. Persinger (CA Bar No. 272996)  
*apersinger@tzlegal.com*  
2 Wesley M. Griffith (CA Bar No. 286390)  
*wgriffith@tzlegal.com*  
3 **TYCKO & ZAVAREEI LLP**  
1970 Broadway, Suite 1070  
4 Oakland, California 94612  
Telephone: (510) 254-6808  
5 Facsimile: (202) 973-0950

6 Ryan J. Clarkson (CA Bar No. 257074)  
*rclarkson@clarksonlawfirm.com*  
7 Katherine A. Bruce (CA Bar No. 288694)  
*kbruce@clarksonlawfirm.com*  
8 Kelsey J. Elling (CA Bar No. 337915)  
*kelling@clarksonlawfirm.com*  
9 **CLARKSON LAW FIRM, P.C.**  
22525 Pacific Coast Highway  
10 Malibu, California 90265  
Telephone: (213) 788-4050  
11 Facsimile (213) 788-4070

12 *Attorneys for Plaintiffs*  
13 *[Additional Counsel on Signature Pages]*

14 **UNITED STATES DISTRICT COURT**  
15 **EASTERN DISTRICT OF CALIFORNIA**

16 RAUL PIZANA, MAUREEN HOBBS,  
17 CHARLES BERGLUND, JEANETTE MILLS,  
18 ERICA LAROCHE, ANNE MARIE LYNCH,  
OSKAR LAFFONT, SAL MUNOZ, and KEITH  
BARNES, *individually and on behalf of all*  
*others similarly situated,*

19 Plaintiffs,

20 v.

21 BASIC RESEARCH, LLC; BR COS LLC;  
22 BASIC RESEARCH HOLDINGS, LLC; BASIC  
RESEARCH INTERMEDIATE, LLC; SIERRA  
23 RESEARCH GROUP, LLC; MAJESTIC  
MEDIA, LLC; CRM SPECIALISTS, LLC;  
24 BYDEX MANAGEMENT, LLC; SANMEDICA  
INTERNATIONAL, LLC; LIMITLESS  
25 WORLDWIDE, LLC; NOVEX BIOTECH,  
L.L.C; BODEE GAY; GINA DAINES; HALEY  
26 BLACKETT; KIMM HUMPHRIES; and  
MITCHELL K. FRIEDLANDER,

27 Defendants.

Case No.: 1:18-cv-00644-ADA-SKO

Case Filed: May 9, 2018  
FAC Filed: June 30, 2018  
SAC Filed: November 13, 2019  
TAC Filed: May 18, 2022

*Assigned to United States District Court  
Judge Ana de Alba and Magistrate Judge  
Shelia K. Oberto*

**JOINT STIPULATION TO EXTEND  
PLAINTIFFS' PAGE LIMITS FOR  
MOTION PRACTICE RELATED TO  
THE THIRD AMENDED  
COMPLAINT; ORDER**

**(Doc. 245)**

*[Proposed Order Filed Concurrently]*

28 **JOINT STIPULATION TO EXTEND PLAINTIFFS' PAGE LIMITS FOR MOTION  
PRACTICE RELATED TO THE THIRD AMENDED COMPLAINT; ORDER**

**CASE No. 1:18-cv-00644-ADA-SKO**

1           **JOINT STIPULATION TO EXTEND PLAINTIFFS’ PAGE LIMITS FOR MOTION**  
2                           **PRACTICE RELATED TO THE THIRD AMENDED COMPLAINT**

3           Plaintiffs Raul Pizana, Maureen Hobbs, Charles Berglund, Jeanette Mills, Erica LaRoche,  
4 Anne Marie Lynch, Oskar Laffont, Sal Munoz, and Keith Barnes (collectively, “Plaintiffs”) and  
5 Basic Research, LLC, BR COS, LLC, Basic Research Holdings, LLC, Basic Research  
6 Intermediate, LLC, Sierra Research Group, LLC, Majestic Media, LLC, CRM Specialists, LLC,  
7 Bydex Management, LLC, NOVEX Biotech, LLC, (together with SanMedica International, LLC,  
8 “SanMedica Defendants”), Bodee Gay, Gina Daines, Haley Blackett, Kimm Humphries  
9 (collectively, the “Gay Defendants”), Limitless Worldwide, LLC (the “Limitless Defendant”), and  
10 Mitchell K. Friedlander (“Defendant Friedlander,” and collectively with the SanMedica  
11 Defendants, the Gay Defendants, and the Limitless Defendant, “Defendants”), through their  
12 respective counsel of record, hereby stipulate and agree as follows:

13           Plaintiffs filed the currently operative Third Amended Complaint (“TAC”) on May 18,  
14 2022. ECF No. 175.

15           The parties agreed to, and the Court ordered, a consolidated briefing schedule for motion  
16 practice related to the TAC. ECF Nos. 205, 206. That order established the following deadlines:

- 17           • August 29, 2022: Defendants’ deadline to file responsive pleadings and motions to  
18 transfer, and to serve any Rule 11 sanctions motions.
- 19           • October 21, 2022: Plaintiffs’ deadline to oppose any motions to dismiss, strike,  
20 transfer, and/or for sanctions.
- 21           • November 18, 2022: Defendants’ deadline to file any replies in support of their  
22 respective motions.

23           This case was previously assigned to Judge Drozd, whose standing order allows 25 pages  
24 for all moving or opposition briefs.

25           On August 17, 2022, Defendant Friedlander requested leave to file a memorandum in  
26 support of his motion to dismiss totaling no more than 40 pages. ECF No. 214.

1 On August 18, 2022, Judge Drozd issued an order “granting Defendant Friedlander leave  
2 to file brief of up to 35 pages, allowing 35 pages for Plaintiffs’ opposition, and granting Friedlander  
3 20 pages in reply. ECF No. 215.

4 On August 24, 2022, this matter was reassigned to Judge de Alba. ECF No. 216.

5 On August 29, 2022, the Gay Defendants filed a motion requesting leave to file a  
6 memorandum in support of their motion to dismiss in excess of this Court’s page limits, and on  
7 August 30, 2022, the Court granted the Gay Defendants leave to file a memorandum totaling no  
8 more than 25 pages. ECF Nos. 219, 229.

9 Between August 29 and September 2, 2022, Defendants filed the following substantive  
10 motions, totaling 126 pages, to which Plaintiffs would be entitled to file 155 total pages in  
11 opposition:

<b>Party</b>	<b>Motion</b>	<b>ECF No.</b>	<b>Pages Filed by Defendant</b>	<b>Current Opposition Page Limit</b>
Friedlander	Motion to Dismiss TAC for Lack of Personal Jurisdiction and for Failure to State a Claim	217	34	35
Friedlander	Motion to Strike TAC re: Irrelevant Matter	218	5	20
Entity Defendants	Motion to Dismiss TAC for Lack of Personal Jurisdiction and to Transfer Venue	220	22	20
Entity Defendants	Motion to Dismiss TAC for Failure to State a Claim <sup>1</sup>	224-1	26	20
Gay Defendants	Motion to Dismiss TAC for Lack of Personal Jurisdiction and Failure to State a Claim, and Motion to Transfer Venue	231	24	20

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<sup>1</sup> At ECF No. 221, the Entity Defendants uploaded a duplicate copy of the Motion to Dismiss previously filed at ECF No. 220. Shortly thereafter, they filed a Notice of Errata indicating that they had intended to file their Motion to Dismiss for failure to state a claim at ECF No. 221, but had mistakenly uploaded the wrong file. ECF No. 224. They filed the intended motion as Exhibit 1 to ECF No. 224. The Court accepted the corrected filing on August 30, 2022. ECF No. 227.

<b>Party</b>	<b>Motion</b>	<b>ECF No.</b>	<b>Pages Filed by Defendant</b>	<b>Current Opposition Page Limit</b>
Limitless	Request for Joinder in Portions of Certain Defendants Motions: Friedlander [217] and Entity Defendants [220, 224] Motions to Dismiss TAC For Lack of Personal Jurisdiction and Failure to State a Claim; and to Transfer Venue	234	3	20
Limitless	Motion for Judgment on the Pleadings on Jurisdictional and Alter-Ego Grounds	237	12	20
<b>Total Pages</b>			126	155

To conserve the resources of the Court and the parties, the parties have agreed that Plaintiffs may instead file two omnibus oppositions:

- An omnibus opposition not to exceed sixty pages to all Defendants' motions to dismiss under Rule 12(b)(6) and 12(b)(1) (ECF Nos. 217, 224-1, and 231); Friedlander's Motion to Strike (ECF No. 218), Limitless's Joinder (ECF No. 234), and Limitless's Motion for Judgment on the Pleadings (ECF No. 237).
- An omnibus opposition to all Defendants' motions to dismiss under Rule 12(b)(2) and/or to transfer venue (ECF Nos. 217, 220, 231) and Limitless's Joinder (ECF No. 234) of no more than 60 pages.

Plaintiffs' two omnibus oppositions will total six pages less than Defendants' currently pending motions and 35 pages less than they otherwise would have been entitled to if they instead individually opposed each motion.

1 **WHEREFORE, THE PARTIES JOINTLY STIPULATE AND REQUEST THE COURT**  
2 **ORDER THAT:**

- 3 • Plaintiffs may file a consolidated opposition to Defendants’ Motions to Dismiss under  
4 Rule 12(b)(6) for failure to state a claim, Rule 12(b)(1) for subject matter jurisdiction,  
5 Friedlander’s Motion to Strike, Limitless’s Joinder, and Limitless’s Motion for  
6 Judgment on the Pleadings of no more than 60 pages.
- 7 • Plaintiffs may file a consolidated opposition to Defendants’ Motions to Dismiss under  
8 Rule 12(b)(2) for lack of jurisdiction and/or to transfer venue to the District of Utah of  
9 no more than 60 pages.

10  
11 Dated: October 17, 2022

*/s/ Wesley Griffith*

\_\_\_\_\_  
Wesley M. Griffith (CA Bar No. 286390)  
*wgriffith@tzlegal.com*  
Annick M. Persinger (CA Bar No. 272996)  
*apersinger@tzlegal.com*  
**TYCKO & ZAVAREEI LLP**  
1970 Broadway, Suite 1070  
Oakland, California 94612  
Telephone: (510) 254-6808  
Facsimile: (202) 973-0900

Ryan J. Clarkson (CA Bar No. 257074)  
*rclarkson@clarksonlawfirm.com*  
Katherine A. Bruce (CA Bar No. 288694)  
*kbruce@clarksonlawfirm.com*  
Kelsey J. Elling (CA Bar No. 337915)  
*kelling@clarksonlawfirm.com*  
**CLARKSON LAW FIRM, P.C.**  
22525 Pacific Coast Highway  
Malibu, California 90265  
Telephone: (213) 788-4050  
Facsimile (213) 788-4070

*Attorneys for Plaintiffs*

1 Dated: October 17, 2022

/s/ Ronald Price (as authorized on October 17, 2022)

Ronald F. Price\*

ronprice@ppktrial.com

Steven W. Garff (CA Bar No. 268074)

steven.garff@ppktrial.com

Jason M. Kerr\*

jasonkerr@ppktrial.com

David R. Parkinson\*

davidparkinson@ppktrial.com

**PRICE PARKINGSON & KERR, PLLC**

5742 West Harold Gatty Drive

Salt Lake City, Utah 84116

Telephone: (801) 530-2900

Stephen Y. Ma (CA Bar No. 214998)

sma@earlysullivan.com

Lisa L. Boswell (CA Bar No. 190304)

lboswell@earlysullivan.com

**EARLY SULLIVAN WRIGHT GIZER & McRAE  
LLP**

6420 Wilshire Boulevard, 17th Floor

Los Angeles, California 90048

Telephone: (323) 301-4660

Facsimile: (323) 301-4676

*Attorneys for Defendants SanMedica International,  
LLC, Basic Research, LLC, BR COS, LLC, Basic  
Research Holdings, LLC, Basic Research  
Intermediate, LLC, Sierra Research Group, LLC,  
Majestic Media, LLC, CRM Specialists, LLC, Bydex  
Management, LLC, NOVEX Biotech, LLC*

17 Dated: October 17, 2022

/s/ Chad Nydegger (as authorized on October 17, 2022)

Chad E. Nydegger\*

cnydegger@wnlaw.com

**WORKMAN NYDEGGER**

60 East South Temple, Suite 1000

Salt Lake City, Utah 84111

Telephone: (801) 533-9800

Facsimile: (801) 328-1707

*Attorney for Defendant Limitless Worldwide, LLC*

1 Dated: October 17, 2022

/s/ Beau Burbidge (as authorized on October 17, 2022)

Beau R. Burbidge (CA Bar No. 267267)

*beau@burbidgemitchell.com*

Clancey S. Henderson\*

*chenderson@burbidgemitchell.com*

**BURBIDGE MITCHELL**

215 South State Street, Suite 920

Salt Lake City, Utah 84111

Telephone: (801) 355-6677

Facsimile: (801) 355-2341

*Attorneys for Defendant Mitchell K. Friedlander*

8 Dated: October 17, 2022

/s/ Evan Strassberg (as authorized on October 17, 2022)

Evan S. Strassberg (CA Bar No. 219336)

*esstrassberg@michaelbest.com*

**MICHAEL BEST & FRIEDRICH LLP**

2750 East Cottonwood Parkway, Suite 560

Cottonwood Heights, Utah 84121

Telephone: (801) 833-0500

Facsimile: (801) 931-2500

*Attorney for Defendants Bodee Gay, Gina Daines,  
Haley Blackett, and Kimm Humphries*

*\*admitted pro hac vice*

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JOINT STIPULATION TO EXTEND PLAINTIFFS' PAGE LIMITS FOR MOTION  
PRACTICE RELATED TO THE THIRD AMENDED COMPLAINT; ORDER

CASE No. 1:18-cv-00644-ADA-SKO

1 **ORDER**

2 **Based on the foregoing stipulation of the parties (Doc. 245) and good cause**  
3 **appearing, IT IS HEREBY ORDERED:**

- 4 • Plaintiffs may file a consolidated opposition to Defendants’ Motions to Dismiss under
- 5 Rule 12(b)(6) for failure to state a claim, Rule 12(b)(1) for subject matter jurisdiction,
- 6 Friedlander’s Motion to Strike, Limitless’s Joinder, and Limitless’s Motion for
- 7 Judgment on the Pleadings of no more than 60 pages.
- 8 • Plaintiffs may file a consolidated opposition to Defendants’ Motions to Dismiss under
- 9 Rule 12(b)(2) for lack of jurisdiction and/or to transfer venue to the District of Utah of
- 10 no more than 60 pages.

11 IT IS SO ORDERED.

12 Dated: October 18, 2022

13 /s/ Sheila K. Oberto  
14 UNITED STATES MAGISTRATE JUDGE