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15 Attorneys for Defendants Basic Research, LLC,  
BR Cos., LLC, Basic Research Intermediate,  
16 LLC, Sierra Research Group, LLC, Majestic  
Media, LLC, CRM Specialists, LLC, Bydex  
17 Management, LLC, SanMedica International,  
LLC, and Novex Biotech, LLC  
18

19 **IN THE UNITED STATES DISTRICT COURT**  
20 **EASTERN DISTRICT OF CALIFORNIA**

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

24 Plaintiffs,

25 vs.

26 BASIC RESEARCH, LLC, BR COS LLC,  
BASIC RESEARCH INTERMEDIATE,  
27 LLC, SIERRA RESEARCH GROUP, LLC,  
MAJESTIC MEDIA, LLC, CRM  
SPECIALISTS, LLC, BYDEX  
28 MANAGEMENT, LLC, SANMEDICA

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

Judge Ana de Alba

Magistrate Sheila K. Oberto

**JOINT STIPULATION AND ORDER  
EXTENDING TIME TO FILE  
DEFENDANTS' REPLIES IN SUPPORT  
OF MOTIONS RELATED TO THE  
THIRD AMENDED COMPLAINT**

(Doc. 256)



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INTERNATIONAL, LLC, LIMITLESS  
WORLDWIDE, LLC, NOVEX BIOTECH,  
L.L.C., BODEE GAY, GINA DAINES,  
HALEY BLACKETT, KIMM  
HUMPHRIES, MITCHELL K.  
FRIEDLANDER,

Defendants.

1 **I. JOINT STIPULATION TO EXTEND DEFENDANTS’ REPLY DEADLINES.**

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

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

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

- 16 • August 29, 2022: Defendants’ deadline to file responsive pleadings and motions to  
17 transfer, and to serve any Rule 11 sanctions motions.<sup>1</sup>
- 18 • October 21, 2022: Plaintiffs’ deadline to oppose any motions to dismiss, strike,  
19 transfer, and/or for sanctions.
- 20 • November 18, 2022: Defendants’ deadline to file any replies in support of their  
21 respective motions.

22 Defendants subsequently filed their respective Motions to dismiss, strike and transfer, and  
23 defendant Limitless also filed a notice of joinder and a motion for judgment on the pleadings, at  
24 ECFs 217, 218, 220, 224-1, 231, 234, and 237 (collectively “Defendants’ Motions to Dismiss and  
25 Transfer”).

26 Some of Plaintiffs’ filings in opposition to Defendants’ Motions to Dismiss and Transfer  
27 \_\_\_\_\_

28 <sup>1</sup> Defendants did not file any sanction motions.

1 were filed in the early morning of October 22, slightly after the midnight deadline on October 21,  
2 2022, specifically: ECFs 249, 250 and 251. Defendants are not prejudiced by the slight delay and  
3 waive any arguments about the timeliness of the filing of ECFs 249, 250 and 251.

4 Defendants also have no procedural objections to Plaintiffs' Notice of Supplemental  
5 Authority (ECF 255), filed by Plaintiffs on November 8, 2022.

6 Due to a combination of attorney illnesses and unexpected work emergencies, counsel for  
7 the various Defendants have represented to Plaintiffs' counsel that Defendants require additional  
8 time to prepare their respective replies in support of Defendants' Motions to Dismiss and Transfer.

9 Given the Thanksgiving holiday on November 24, 2022, Defendants believe that December  
10 2, 2022 is a fair and workable deadline, and Plaintiffs have agreed that, subject to court approval,  
11 all replies in support of Defendants' Motions to Dismiss and Transfer may be filed on or before that  
12 date.

13 The parties enter into this stipulation in good faith and not for purposes of delay.

14 **WHEREFORE, THE PARTIES JOINTLY STIPULATE AND REQUEST THE COURT**  
15 **ORDER THAT:**

- 16 • Defendants may, respectively, file their replies in support of Defendants' Motions to  
17 Dismiss and Transfer on or before December 2, 2022.
- 18 • Defendants waive any arguments about the timeliness of the filing of ECFs 249, 250 and  
19 251.
- 20 • Defendants have no procedural objections to ECF 255.

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1 Dated: November 16, 2022

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***LLC, Basic Research, LLC, BR COS, LLC, Basic***  
15 ***Research Holdings, LLC, Basic Research***  
***Intermediate, LLC, Sierra Research Group, LLC,***  
16 ***Majestic Media, LLC, CRM Specialists, LLC, Bydex***  
***Management, LLC, NOVEX Biotech, LLC***

17 Dated: November 16, 2022

18 /s/ Annick M. Persinger (authorized on November 16,  
19 2022)

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*Attorneys for Plaintiffs*

Dated: November 16, 2022

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1 Dated: November 16, 2022

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**ORDER**

**Based on the foregoing stipulation of the parties (Doc. 256) and good cause appearing,**

**IT IS HEREBY ORDERED:**

- Defendants may, respectively, file their replies in support of Defendants’ Motions to Dismiss and Transfer on or before December 2, 2022.
- Defendants waive any arguments about the timeliness of the filing of Docs. 249, 250 and 251.
- Defendants have no procedural objections to Doc. 255.

IT IS SO ORDERED.

Dated: November 17, 2022

*/s/ Sheila K. Oberto*  
UNITED STATES MAGISTRATE JUDGE