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18 UNITED STATES DISTRICT COURT
19 EASTERN DISTRICT OF CALIFORNIA
20 SACRAMENTO DIVISION

21 PRIME HEALTHCARE SERVICES
22 SHASTA, LLC,

23 Plaintiff,

24 vs.

25 GOVERNMENT EMPLOYEES HEALTH
26 ASSOCIATION, INC.; and DOES 1
27 through 100, inclusive,

28 Defendants.

CASE NO. 2:16-cv-01559-WBS-CMK

**STIPULATION AND [PROPOSED]
ORDER] TO CONTINUE DEADLINE TO
RESPOND TO COMPLAINT**

29 Plaintiff Prime Healthcare Services Shasta, LLC (“Plaintiff”) and
30 Defendant Government Employees Health Association, Inc. (“Defendant”), by
31 and through their respective counsel of record, hereby stipulate as follows:

32 WHEREAS, the instant Complaint was served on Defendant on June 8,
33 2016;

34 WHEREAS, Defendant timely removed the action to the Eastern District
35 on July 7, 2016;

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1 WHEREAS, the Parties are working cooperatively in exchanging
2 information to understand the issues in this matter;

3 WHEREAS, the Parties stipulated to extend Defendant's deadline to
4 respond to the Complaint to September 14, 2016;

5 WHEREAS, the Parties jointly agree to extend Defendant's deadline to
6 respond to the Complaint by an additional 14 days;

7 NOW, THEREFORE, the Parties, by and through their respective counsel
8 of record, agree and stipulate as follows:

- 9 1. The deadline for Defendant to respond to the Complaint be extended
10 by an additional 14 days, up to and including September 28, 2016.

11
12 DATED: September 13, 2016

Respectfully submitted,

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14 By: /s/ Eric De Wames
Eric De Wames
15 MESSNER REEVES LLP

16 and

17 Neal F. Perryman (*admitted pro hac vice*)
18 Michael L. Jente (*admitted pro hac vice*)
LEWIS RICE LLC

19 Attorneys for Defendant
20 GOVERNMENT EMPLOYEES HEALTH
ASSOCIATION, INC.

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ORDER

IT IS HEREBY ORDERED that Defendant's deadline to respond to the Complaint is extended by an additional 14 days, up to and including September 28, 2016.

Dated: September 15, 2016



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

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