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5 Attorneys for Defendant  
 6 ALLIANCE HEALTH NETWORKS, LLC

7 **UNITED STATES DISTRICT COURT**  
 8 **EASTERN DISTRICT OF CALIFORNIA**

10 JEFF LINGLE AND XUANDAO  
 11 GRAY-LINGLE, INDIVIDUALLY  
 AND ON BEHALF OF ALL OTHERS  
 12 SIMILARLY SITUATED,

13 Plaintiffs,

14 v.

15 ALLIANCE HEALTH NETWORKS,  
 16 LLC,

17 Defendant.  
 18

Case No. 2:17-cv-00056-TLB-DB

**CLASS ACTION**

**STIPULATION EXTENDING TIME  
 TO ANSWER COMPLAINT**

19 WHEREAS, it is hereby stipulated by and between the parties, through the  
 20 respective attorneys of record, as follows:

21 WHEREAS, Plaintiff filed his Complaint in this action on January 10, 2017  
 22 in the United States District Court for the Eastern District of California and served  
 23 the Complaint on February 3, 2017.

24 WHEREAS, pursuant to Rule 21 of the Federal Rules of Civil Procedure, the  
 25 current deadline for Defendant to respond to the Complaint is February 24, 2017.

26 WHEREAS, Defendant recently retained counsel in this matter.

27 WHEREAS, Defendant seeks an extension of time of forty-five (45) days to  
 28

1 serve and file its response to the Complaint.

2 WHEREAS, Having just recently been retained, the requested extension is  
3 necessary for Defendant's counsel to complete a thorough review and analysis of  
4 the Complaint's allegations, research the underlying facts, and formulate a  
5 sufficient response by answer or motion.

6 WHEREAS, The requested extension will also promote efficiency and  
7 settlement by enabling Defendant to further pursue a preliminary settlement  
8 dialogue and possibly secure a speedy resolution of this matter without incurring  
9 legal expenses in preparing a responsive pleading, including a Rule 12(b) motion  
10 that would necessitate further litigation expense and judicial labor.

11 WHEREAS, Defendant does not seek the requested extension for purposes of  
12 delay, but rather to enable its attorneys to formulate a sufficient responsive pleading  
13 after pursuing an early resolution of this dispute.

14 THEREFORE, the parties stipulate to and respectfully request an order  
15 extending the time for Defendant to respond to the Complaint until and including  
16 April 7, 2017, or such other date as the Court may find appropriate.

17 Respectfully submitted,

18  
19 Dated: February 23, 2017

MANATT, PHELPS & PHILLIPS, LLP

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21 By: /s/ Christine M. Reilly  
22 Attorneys for Defendant  
ALLIANCE HEALTH NETWORKS,  
LLC

23 Dated: February 23, 2017

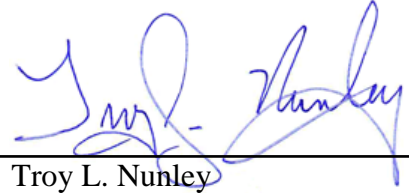
LAW OFFICES OF TODD FRIEDMAN

24  
25 /s Adrian R. Bacon  
26 Adrian R. Bacon, Esq.  
27 Attorney for Plaintiffs  
28 Jeff Lingle and Xuandao Gray-Lingle

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**IT IS SO ORDERED.**

Dated: February 23, 2017



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Troy L. Nunley  
United States District Judge