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13 Attorneys for Defendant
 THOMAS E. PRICE, M.D.
 14 Secretary, Department of Health & Human Services

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 16 IN THE UNITED STATES DISTRICT COURT
 17 EASTERN DISTRICT OF CALIFORNIA
 18

19 PRIME HEALTHCARE SERVICES –
 SHASTA LLC, a Delaware limited liability
 20 company doing business as Shasta Regional
 Medical Center,

21 Plaintiff,

22 v.

23 THOMAS E. PRICE, M.D., in his official
 24 capacity as Secretary of the Department of
 Health and Human Services,

25 Defendant.
 26

Case Nos. 2:17-cv-00069-TLN-KJN
 2:17-cv-00071-TLN-KJN
 2:17-cv-00072-TLN-KJN
 2:17-cv-00073-TLN-KJN
 2:17-cv-00074-TLN-KJN
 2:17-cv-00082-TLN-KJN
 2:17-cv-00431-TLN-KJN

STIPULATION AND ORDER FOR:

- (1) AMENDING THE COMPLAINT; AND**
- (2) SETTING DEFENDANT’S DEADLINE FOR RESPONDING TO THE AMENDED COMPLAINT**

1 **STIPULATION AND PROPOSED ORDER**

2 IT IS HEREBY STIPULATED, by and between Plaintiff Prime Healthcare Services – Shasta,
3 LLC, and Defendant Thomas E. Price, M.D., through their undersigned counsel and subject to Court
4 approval, that:

5 1. Plaintiff shall file First Amended Complaints in each of the above-captioned related cases
6 on or before August 14, 2017; and

7 2. Defendant’s responses to the First Amended Complaints in the above-captioned related
8 cases shall be filed on or before September 5, 2017.

9 Having met and conferred, the parties arrived at this Stipulation and Proposed Order to allow
10 Plaintiff to supplement its factual allegations in the operative pleadings and potentially avoid
11 unnecessary motions to dismiss under Rules 12(b)(6) and 8(a) of the Federal Rules of Civil Procedure.

12 Dated: July 24, 2017

PHILLIP A. TALBERT
United States Attorney

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14 By: /s/ Joseph B. Frueh
15 JOSEPH B. FRUEH
16 PHILIP A. SCARBOROUGH
17 Assistant United States Attorneys

18 Attorneys for Defendant
19 THOMAS E. PRICE, M.D.
20 Secretary, Department of Health & Human Services

TROY A. SCHELL, ESQ.
BRYAN WONG, ESQ.

21 By: /s/ Bryan Wong (authorized on 7/24/2017)
22 Bryan Wong, Esq.

23 Attorneys for Plaintiff
24 Prime Healthcare Services – Shasta, LLC

25 **IT IS SO ORDERED.**

26 Dated: July 25, 2017

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28 Troy L. Nunley
United States District Judge