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8 Attorneys for Defendants KAISER
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 9 KAISER FOUNDATION HOSPITALS,
 INC., THE PERMANENTE MEDICAL
 10 GROUP, INC., SOUTHERN
 CALIFORNIA PERMANENTE
 11 MEDICAL GROUP, and COLORADO
 PERMANENTE MEDICAL GROUP,
 12 P.C.

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 14 UNITED STATES DISTRICT COURT
 15 EASTERN DISTRICT OF CALIFORNIA
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17 UNITED STATES *et al. ex rel.*
 18 JEFFREY MAZIK,
 19 Plaintiffs,
 20 v.
 21 KAISER FOUNDATION HEALTH
 PLAN, INC., KAISER FOUNDATION
 22 HOSPITALS, INC., and THE
 23 PERMANENTE MEDICAL GROUPS,
 24 Defendants.

Case No. 2:19-cv-0559 JAM-KJN

**JOINT STIPULATION AND
 ORDER RE: RESPONSE TO FIRST
 AMENDED COMPLAINT AND
 BRIEFING SCHEDULE**

 Judge: Hon. John A. Mendez

 Complaint Filed: April 1, 2019
 First Amended
 Complaint Filed: April 2, 2021
 Trial Date: None Set

1 **JOINT STIPULATION**

2 Pursuant to Local Rule 143, *Qui Tam* Plaintiff-Relator Jeffrey Mazik
3 (“Relator”) and Defendants Kaiser Foundation Health Plan, Inc., Kaiser Foundation
4 Hospitals, Inc., The Permanente Medical Group, Inc., Southern California
5 Permanente Medical Group, and Colorado Permanente Medical Group, P.C.
6 (collectively the “Kaiser Defendants”), by and through their attorneys of record,
7 hereby stipulate and request as follows:

8 WHEREAS on January 31, 2022, this Court ordered, pursuant to the
9 stipulation of Relator and the Kaiser Defendants, that this action is stayed, and no
10 response to the pleadings is required, until thirty days after the court in the
11 Consolidated Cases rules on all “first-to-file” motions (DKT. No. 69);

12 WHEREAS on May 5, 2022, the court in the Consolidated Cases granted in
13 part and denied in part the only first-to-file motion filed in the Consolidated Cases
14 (copy attached as Exhibit A);

15 WHEREAS the Kaiser Defendants’ response to the First Amended Complaint
16 is presently due on June 6, 2022;

17 WHEREAS in response to the First Amended Complaint, the Kaiser
18 Defendants intend to file a first-to-file motion pursuant to Fed. R. Civ. P. 12(b)(1)
19 and a motion to dismiss pursuant to Fed. R. Civ. P. 12(b)(6);

20 WHEREAS given the number of claims and issues to be addressed, the Kaiser
21 Defendants seek a thirty-day extension of the time to file their motions, to which
22 Relator is agreeable, subject to having thirty days to respond to the Kaiser
23 Defendants’ motions;

24 NOW THEREFORE, it is hereby stipulated by and between Relator and the
25 Kaiser Defendants that:

- 26 1. The Kaiser Defendants’ motions in response to the First Amended
27 Complaint will be filed on or before July 6, 2022.

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: May 23, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE