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8 Attorneys for Defendants KAISER  
FOUNDATION HEALTH PLAN, INC.  
9 and KAISER FOUNDATION  
HOSPITALS, INC., THE  
10 PERMANENTE MEDICAL GROUP,  
INC., SOUTHERN CALIFORNIA  
11 PERMANENTE MEDICAL GROUP, and  
COLORADO PERMANENTE  
12 MEDICAL GROUP, 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.  
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Case No. 2:19-cv-0559 JAM-KJN

**SECOND 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, pursuant to the Joint Stipulation and Order entered on May 23,  
9 2022 (DKT. No. 72), the Kaiser Defendants’ response to the First Amended  
10 Complaint is presently due on July 6, 2022, which response will be a file a first-to-  
11 file motion pursuant to Fed. R. Civ. P. 12(b)(1) and a motion to dismiss pursuant to  
12 Fed. R. Civ. P. 12(b)(6), Relator’s oppositions are due on August 5, 2022, and the  
13 Kaiser Defendants’ replies are due on August 26, 2022;

14 WHEREAS, the first available hearing date before the Court is not until  
15 September 27, 2022;

16 WHEREAS, Relator’s counsel is unable to appear for a hearing on September  
17 27, October 4, and October 11, 2022 due to Jewish holidays;

18 WHEREAS, given that the first hearing date on which respective counsel are  
19 available to appear is not until October 18, 2022, the Kaiser Defendants seek a one-  
20 week extension of the time to file their motions, to which Relator is agreeable,  
21 subject to having a one-week extension of the time to file oppositions to the Kaiser  
22 Defendants’ motions;

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

25 1. The Kaiser Defendants’ motions in response to the First Amended  
26 Complaint will be filed on or before July 13, 2022.

27 2. Relator’s oppositions will be filed on or before August 12, 2022.  
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1           3.     The Kaiser Defendants' replies will be filed on or before September 2,  
2 2022.

3           4.     The hearing on the motions will be on October 18, 2022, or as soon  
4 thereafter subject to the Court's availability.

5           **IT IS SO STIPULATED.**

6  
7 Dated: July 1, 2022

8                               SHEPPARD, MULLIN, RICHTER & HAMPTON  
9                               LLP

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11                            By                              /s/ Charles L. Kreindler            
12    CHARLES L. KREINDLER

13   Attorneys for Defendants KAISER  
14   FOUNDATION HEALTH PLAN, INC.,  
15   KAISER FOUNDATION HOSPITALS, INC.  
16   THE PERMANENTE MEDICAL GROUP,  
17   INC., SOUTHERN CALIFORNIA  
18   PERMANENTE MEDICAL GROUP, and  
19   COLORADO PERMANENTE MEDICAL  
20   GROUP, P.C.

21 Dated: July 1, 2022

                              POLLOCK COHEN LLP

22  
23   By:                              [as authorized on July 1, 2022]  
  /s/ Adam L. Pollock            
24   ADAM L. POLLOCK

25   Attorneys for Plaintiff-Relator JEFFREY  
26   MAZIK

1                   **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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4                   Dated: July 5, 2022

5                   /s/ John A. Mendez

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7                   THE HONORABLE JOHN A. MENDEZ  
8                   UNITED STATES DISTRICT COURT JUDGE  
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