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12 Attorneys for Defendants WELLPATH, LLC; WELLPATH MANAGEMENT, INC.; CRYSTAL
 13 COMER; TANYA ATKINSON and PAMELA JOHANSEN

14 **UNITED STATES DISTRICT COURT**
 15 **EASTERN DISTRICT OF CALIFORNIA**

16 DARIO CERAGIOLI, deceased by and
 17 through ELIZABETH CERAGIOLI, as
 18 Successor in Interest, ELIZABETH
 19 CERAGIOLI in her personal capacity, MARY
 20 CERAGIOLI, ANTHONY CERAGIOLI, and
 21 JOSHUA CERAGIOLI,

22 Plaintiffs,

23 vs.

24 BUTTE COUNTY, a municipal corporation;
 25 Sheriff KORY L. HONEA; CASEY O’HERN;
 26 JOSEPH GEORGE; CRYSTAL COMER; TANYA
 27 ATKINSON; PAMELA JOHANSEN; and
 28 WELLPATH, LLC; WELLPATH
 MANAGEMENT, Inc.; and DOES 1 through 60,
 inclusive,

Defendants.

CASE NO. 2:23-cv-01113-TLN-DMC

**STIPULATION AND ORDER TO
 EXTEND DEADLINE FOR WELLPATH
 DEFENDANTS TO RESPOND TO FIRST
 AMENDED COMPLAINT**

Complaint Filed: June 12, 2023
 1st Am. Comp. Filed: June 12, 2024
 Trial Date: None Set

26 Plaintiffs DARIO CERAGIOLI, deceased by and through ELIZABETH CERAGIOLI, as
 27 Successor in Interest, ELIZABETH CERAGIOLI in her personal capacity, MARY CERAGIOLI,
 28 ANTHONY CERAGIOLI, and JOSHUA CERAGIOLI and Defendants WELLPATH, LLC,

1 WELLPATH MANAGEMENT, INC., CRYSTAL COMER, TANYA ATKINSON, and PAMELA
2 JOHANSEN (“Wellpath Defendants”), by and through their undersigned counsel of record, and subject
3 to the approval of the Court, stipulate as follows:

4 RECITALS

5 A. On June 12, 2024, Plaintiffs filed a First Amended Complaint (ECF 34).

6 B. The responsive pleading on behalf of the Wellpath Defendants to the First Amended
7 Complaint is due on July 3, 2024.

8 C. The parties are meeting and conferring as to the potential filing of a Motion to Dismiss on
9 behalf of Defendants WELLPATH, LLC and WELLPATH MANAGEMENT, INC. as to Counts 5 and
10 9 of the First Amended Complaint. The parties hope to avoid further motion practice but require
11 additional time to meet and confer on these issues.

12 D. This is the parties’ first stipulation to extend the time for the Wellpath Defendants to file a
13 responsive pleading to the First Amended Complaint.

14 E. In light of the above, the parties stipulate that the responsive pleading on behalf of the
15 Wellpath Defendants will be extended 30 days from the original deadline. The new deadline will be
16 August 2, 2024.

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1 STIPULATION

2 Given the foregoing, the parties respectfully request that the Court approve the parties' stipulation
3 that the deadline to file a responsive pleading on behalf of the Wellpath Defendants be extended 30 days
4 to August 2, 2024.

5 Dated: July 1, 2024

6 **MEDICAL DEFENSE LAW GROUP**

7 */s/ Paul A. Cardinale*

8 By: _____

9 Paul A. Cardinale, Esq.
10 Attorney for Defendants WELLPATH, LLC;
11 WELLPATH MANAGEMENT, INC.; CRYSTAL
12 COMER; TANYA ATKINSON and PAMELA
13 JOHANSEN

14 Dated: July 1, 2024

15 **MITCHELL LEEDS, LLP**

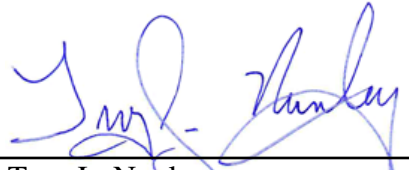
16 By: _____

17 Nathaniel M. Leeds, Esq.
18 Jeffrey Mitchell, Esq.
19 Attorney for Plaintiffs DARIO CERAGIOLI, deceased
20 by and through ELIZABETH CERAGIOLI, as
21 Successor in Interest, ELIZABETH CERAGIOLI in
22 her personal capacity, MARY CERAGIOLI,
23 ANTHONY CERAGIOLI, and JOSHUA CERAGIOLI

24 **ORDER**

25 PURSUANT TO STIPULATION, IT IS SO ORDERED that the deadline to file a responsive
26 pleading on behalf of the Wellpath Defendants is extended until August 2, 2024.

27 Dated: July 2, 2024

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Troy L. Nunley
United States District Judge