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17 **UNITED STATES DISTRICT COURT**
18 **EASTERN DISTRICT OF CALIFORNIA**

19 CATHERINE ROPER,
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21 Plaintiff,
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23 vs.
24
25 HEALTHCARE MANAGEMENT
26 ADMINISTRATORS, INC.; G5 SEARCH
27 MARKETING, INC.; G5 HEALTH AND
28 WELFARE PLAN; and DOES 1 through 10,
Defendant.

Case No. 2:23-cv-01855-DJC-CKD
**REVISED JOINT STATUS REPORT
AND STIPULATION TO VACATE
CURRENT DEADLINES AND SUBMIT
AMENDED JOINT STATUS REPORT
AFTER MEDIATION**

1 Plaintiff CATHERINE ROPER (“Plaintiff”) and Defendants Health Management
2 Administrators, Inc. (“HMA”), G5 SEARCH MARKETING, INC. and G5 HEALTH AND
3 WELFARE PLAN (“G5 Defendants”) (collectively, “the Parties”), by and through their
4 undersigned counsel, hereby submit this Stipulation as follows:

5 **WHEREAS**, on August 29, 2023, Plaintiff filed her Complaint in the above-captioned
6 action (the “Complaint”);

7 **WHEREAS**, on December 15, 2023, HMA filed its Answer to the Complaint;

8 **WHEREAS**, on February 23, 2024, G5 Defendants filed its Answer to the Complaint;

9 **WHEREAS**, on May 2, 2024 the Parties filed their Joint Status Report in this case;

10 **WHEREAS**, on May 7, 2024 the Court entered a Minute Order directing that “Plaintiff
11 shall file a motion re standard of review no later than 6/14/2024 and shall notice said motion for
12 hearing on 8/8/2024 at 1:30 PM in Courtroom 10 before District Judge Daniel J. Calabretta;
13 Defendant shall file its opposition to Plaintiff's motion no later than 6/28/2024; Plaintiff shall file a
14 reply, if any, no later than 7/8/2024.”

15 **WHEREAS**, on May 16, 2024 the Court held an Initial Scheduling Conference via
16 videoconference during which the Parties informed that Court that they are continuing to explore
17 the possibility for an early, global resolution of this matter and were attempting to schedule
18 mediation;

19 **WHEREAS**, following the Initial Scheduling Conference the “Court ORDERED the
20 parties to meet and confer and within fourteen (14) days to file an updated joint status report
21 advising the Court as to how the parties plan to proceed with mediation and proposing a new
22 briefing schedule re Plaintiff's forthcoming motion re standard of review.”

23 **WHEREAS**, the Parties have now confirmed a mediation date of August 26, 2024;

24 **WHEREAS**, the Parties have met and conferred via email and believe that it would be in
25 their best interests and in the interests of the Court to vacate the currently-pending briefing
26 deadlines for the Motion Regarding Standard of Review pending completion of the mediation. The
27 Parties likewise believe that it would be most efficient to permit the Parties to submit an Amended
28 Joint Statement fourteen (14) days after the mediation (i.e., by September 9 2024) if necessary to

1 Dated: 5/30/2024

GREENBERG TRAURIG, LLP

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By: /s/ Jon T. Neumann

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Jon T. Neumann

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Attorneys for Defendant
HEALTHCARE MANAGEMENT
ADMINISTRATORS, INC.

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7 Dated: 5/30/2024

TROUTMAN PEPPER HAMILTON SANDERS
LLP

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By: /s/ Jenny C. Chien

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Chad Fuller

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Jenny C. Chien

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Attorneys for Defendants,
G5 SEARCH MARKETING, INC. and G5
HEALTH AND WELFARE PLAN

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15 Dated: 5/30/2024

DL LAW GROUP

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By: /s/ David M. Lilienstein

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David M. Lilienstein

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Katie Spielman

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Attorneys for Plaintiff
CATHERINE ROPER

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IT IS SO ORDERED.

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Dated: June 3, 2024

/s/ Daniel J. Calabretta

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THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE

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