

1 BLUMENTHAL, NORDREHAUG & BHOWMIK  
 Norman B. Blumenthal (SBN 068687)  
 2 Kyle R. Nordrehaug (SBN 205975)  
 Aparajit Bhowmik (SBN 248066)  
 3 Piya Mukherjee (SBN 274217)  
 2255 Calle Clara  
 4 La Jolla, CA 92037  
 Telephone: (858) 551-1223  
 5 Facsimile: (858) 551-1232

6 Attorneys for Plaintiffs

7 MORGAN, LEWIS & BOCKIUS LLP  
 John S. Battenfeld (SBN 119513)  
 8 300 South Grand Avenue  
 Los Angeles, California 90071-3132  
 9 Telephone: (213) 612-2500  
 Facsimile: (213) 612-2501

10 Attorneys for Defendants  
 11 COVENTRY HEALTH CARE, INC. and  
 COVENTRY HEALTH CARE WORKERS'  
 12 COMPENSATION, INC.

13 UNITED STATES DISTRICT COURT  
 14 FOR THE NORTHERN DISTRICT OF CALIFORNIA

15 JULIA A. RIEVE, an individual, on behalf of ) 16 herself and all persons similarly situated, ) 17 ) Plaintiff, ) 18 ) v. ) 19 ) COVENTRY HEALTH CARE, INC., ) 20 and COVENTRY HEALTH CARE ) WORKERS COMPENSATION, INC., ) 21 ) Defendant. )	Case No. CV 11-1786 MMC <b>STIPULATION AND [PROPOSED]</b> <b>ORDER TO TRANSFER VENUE TO</b> <b>THE CENTRAL DISTRICT OF</b> <b>CALIFORNIA PURSUANT TO 28 U.S.C.</b> <b>§ 1404(a); ORDER THEREON</b> Complaint Filed: April 12, 2011
---	--

22  
 23  
 24  
 25  
 26  
 27  
 28

1 Plaintiff Julia A. Rieve (“Plaintiff”) and Defendants Coventry Health Care, Inc. and  
2 Coventry Health Care Workers’ Compensation, Inc. (“Defendants”), having met and conferred  
3 regarding proper venue for this matter, have agreed that this matter should be transferred to the  
4 United States District Court for the Central District of California, Southern Division, pursuant to  
5 28 U.S.C. § 1404(a). Accordingly, the parties hereby stipulate as follows:

6 WHEREAS, Plaintiff filed her First Amended Complaint on April 12, 2011;

7 WHEREAS, Defendant thereafter filed a Motion to Transfer Venue to the Southern  
8 Division of the Central District of California pursuant to 28 U.S.C. § 1404(a) on the grounds that  
9 (i) Plaintiff’s claims could have been brought in that district; (ii) the convenience of the  
10 witnesses and parties favors a transfer; (iii) events relevant to Plaintiff’s claims and Defendant’s  
11 defenses occurred in the Central District (*e.g.*, Plaintiff’s supervisor was employed by Defendant  
12 in the Central District of California) and, thus, sources of proof are in the Central District; and,  
13 (iv) the interests of justice are furthered by such a transfer; and

14 WHEREAS, after filing its Motion, Plaintiff’s counsel met and conferred with  
15 Defendant’s counsel regarding Defendant’s Motion to Transfer Venue, and the parties ultimately  
16 agreed that this action should be transferred to the Southern Division of the Central District of  
17 California for the convenience of the parties and witnesses;

18 NOW, THEREFORE, the parties hereby stipulate and agree, and respectfully request that  
19 the Court order, that the above-captioned action be transferred to the Southern Division of the  
20 Central District of California. The parties further stipulate and agree that, upon transfer, they  
21 will meet and confer as to a briefing schedule for Plaintiffs’ motion for class certification that is  
22 outside of the timing required by Central District Local Rule 23-3.

23 **IT IS SO STIPULATED.**

24  
25  
26 DATED: July 6, 2011

BLUMENTHAL, NORDREHAUG &  
BHOWMIK

27 By           /s/ Aparajit Bhowmik            
28 Attorneys for Plaintiff  
JULIA A. RIEVE

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: July 6, 2011

MORGAN, LEWIS & BOCKIUS LLP

By /s/ John S. Battenfeld  
John S. Battenfeld  
Attorneys for Defendants  
COVENTRY HEALTH CARE, INC. and  
COVENTRY HEALTH CARE WORKERS'  
COMPENSATION, INC.

**~~PROPOSED~~ ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.** The Court hereby orders that this action be transferred to the Central District of California, Southern Division. No further proceedings shall be had in this Court in this action.

DATED: July 7, 2011

  
THE HONORABLE MAXINE M. CHESNEY  
UNITED STATES DISTRICT COURT JUDGE