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14 CROSS; ANTHEM BLUE CROSS LIFE AND  
HEALTH INSURANCE COMPANY

15 *Additional counsel listed on signature page*

16  
17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA

19 THE PEOPLE OF THE STATE OF  
CALIFORNIA, acting by and through  
20 City Attorney Dennis J. Herrera,

21 Plaintiffs,

22 vs.

23 BLUE CROSS OF CALIFORNIA, INC.  
d/b/a ANTHEM BLUE CROSS;  
24 ANTHEM BLUE CROSS LIFE AND  
HEALTH INSURANCE COMPANY;  
25 HEALTH NET OF CALIFORNIA, INC.,  
and Does 1-50 Inclusive,

26 Defendants.  
27

Case No. 11-CV-3107-SI

**JOINT STIPULATION AND [PROPOSED]  
ORDER MODIFYING TIME FOR  
BRIEFING ON PLAINTIFF'S MOTION  
TO REMAND**

1 **JOINT STIPULATION**

2 Pursuant to Northern District of California Local Rule 6-2, Defendants Blue Cross of  
3 California, Inc. d/b/a Anthem Blue Cross (“ABC”), Anthem Blue Cross Life and Health  
4 Insurance Company (“ABCL&H”), and Health Net, Inc. (“Health Net”) (collectively  
5 “Defendants”) and Plaintiff, the People of the State of California (“Plaintiff”), by and through  
6 their respective counsel, submit the following Joint Stipulation and [Proposed] Order Modifying  
7 Time for Briefing on Plaintiff’s Motion to Remand, in reference to the following facts and  
8 circumstances:

9 WHEREAS, on or about May 24, 2011, Plaintiff filed its Complaint in the Superior Court  
10 of the State of California for the County of San Francisco, and was assigned State Court case  
11 number CGC-11-511181;

12 WHEREAS, on or about June 23, 2011, Defendant Health Net, with the consent of  
13 Defendants ABC and ABCL&H, filed a Notice of Removal pursuant to 28 U.S.C. Section 1331,  
14 28 U.S.C. Section 1441, and 28 U.S.C. Section 1446;

15 WHEREAS, on or about June 24, 2011, Defendants ABC and ABCL&H filed a notice of  
16 joinder in Health Net’s Notice of Removal;

17 WHEREAS, on or about June 29, 2011, pursuant to Northern District of California Local  
18 Rule 6-1(a) the Parties jointly stipulated to extend the time for Defendants to respond to  
19 Plaintiff’s Complaint to within thirty (30) days after either: (1) the filing of the Court’s order, if  
20 any, on any Motion to Remand that Plaintiff might file; or (2) the deadline for Plaintiff to file a  
21 Motion to Remand expires;

22 WHEREAS, on or about August 11, 2011, Plaintiff filed its Motion to Remand, which  
23 motion was noticed for hearing on September 30, 2011;

24 WHEREAS, the Court set a briefing schedule for Plaintiff’s Motion to Remand which  
25 requires Defendants to file Responses by October 14, 2011 and Plaintiff to file its Reply by  
26 October 21, 2011, both deadlines which would occur *after* the September 30, 2011 hearing date  
27 set by the Court;

28 THEREFORE, IT IS HEREBY STIPULATED, by and between the undersigned

1 attorneys, subject to the approval of the Court, that (1) Defendants shall file their Opposition to  
2 Plaintiff's Motion to Remand on or before September 6, 2011, and (2) Plaintiffs shall file their  
3 Reply in support of Motion to Remand on or before September 16, 2011. Under the Parties  
4 proposed schedule, the hearing on Plaintiff's Motion to Remand would remain on calendar for  
5 September 30, 2011.

6 SO STIPULATED:

7 Dated: August 19, 2011

MORGAN, LEWIS & BOCKIUS LLP

8 By: /s/ Molly Lane

9 MOLLY MORIARTY LANE (SBN 149206)  
10 NICOLE A. DILLER (SBN 154842)  
11 KATHLEEN M. WATERS (SBN 194892)  
Attorneys for Defendant  
Health Net Of California, Inc.

12 Dated: August 19, 2011

FOLEY & LARDNER LLP

13 By: /s/ Michael Naranjo

14 EILEEN RIDLEY (SBN 151735)  
15 MICHAEL NARANJO (SBN 221449)  
Attorneys for Defendants  
16 Blue Cross of California, Inc. d/b/a Anthem  
Blue Cross and Anthem Blue Cross Life and  
17 Health Insurance Company

18 Dated: August 19, 2011

SAN FRANCISCO CITY ATTORNEY'S OFFICE

19 By: /s/ Owen Clements

20 DENNIS J. HERRERA (SBN 139669)  
21 DANNY CHOU (SBN 180240)  
22 OWEN J. CLEMENTS (SBN 141805)  
ROBERT A. BONTA (SBN 202668)  
Attorneys for Plaintiff  
23 The People of the State of California

24 PURSUANT TO THE STIPULATION, IT IS SO ORDERED:

25  
26 Dated: August 25, 2011



27  
28 The Honorable Susan Illston  
Judge of the U.S. District Court