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 12 (erroneously named as the Members of the Dignity
 Health Retirement Committee)
 13

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN FRANCISCO DIVISION
 17

18 STARLA ROLLINS on behalf of herself,
 individually, and on behalf of all others
 19 similarly situated,

20 Plaintiff,

21 v.

22 DIGNITY HEALTH, a California non-profit
 corporation, HERBERT J. VALLIER,
 23 an individual, the members of the Dignity
 Retirement Committee, and JOHN and
 24 JANE DOES, each an individual, 1-20,

25 Defendants.
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Case No. 13-C-1450 TEH

**STIPULATED REQUEST FOR AN
 ORDER MODIFYING BRIEFING
 SCHEDULE AND CONTINUING
 HEARING DATE FOR PLAINTIFF'S
 MOTION FOR PARTIAL SUMMARY
 JUDGMENT; ~~PROPOSED~~ ORDER**

[Civil L.R. 6-2]

1 Pursuant to Civil Local Rule 6-2, plaintiff Starla Rollins (“Rollins”) and defendants
2 Dignity Health, Herbert J. Vallier, and the Retirement Plans Sub-Committee (erroneously named
3 as the members of the Dignity Health Retirement Committee) (collectively, “Defendants”), agree
4 and stipulate, by and through their undersigned counsel of record, as follows:

5 WHEREAS, Rollins filed a motion for partial summary judgment (“Motion”) on February
6 20, 2014;

7 WHEREAS, Defendants’ opposition to the Motion is due no later than March 6, 2014 per
8 Civil Local Rule 7-3;

9 WHEREAS, Rollins’ reply in support of the Motion currently is due no later than March
10 13, 2014 per Civil Local Rule 7-4;

11 WHEREAS, the hearing on the Motion currently is set for March 31, 2014 at 10:00 a.m.;

12 WHEREAS, Rollins and Defendants agree that both sides, and the Court, will benefit
13 from additional time to address the issues raised in the Motion;

14 WHEREAS, this is the first time the parties request to modify the briefing schedule and
15 continue the hearing date for the Motion; and

16 WHEREAS modifying the briefing schedule and continuing the hearing date for the
17 Motion will not alter the date of any other event or deadline already fixed by the Court.

18 NOW, THEREFORE, THE PARTIES STIPULATE AND AGREE AS FOLLOWS:

19 1. Defendants shall have until March 20, 2014 to file its papers regarding opposition
20 to the Motion;

21 2. Rollins shall have until April 3, 2014 to file her reply papers in support of the
22 Motion;

23 3. The hearing on the Motion shall be continued to April 14, 2014 at 10:00 a.m.; and

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1 4. This stipulation is without prejudice to the parties' rights to seek further extensions
2 of time to file briefing related to the Motion or continuances of the hearing on the Motion, which
3 rights are expressly reserved.

4 IT IS SO STIPULATED.

5 KELLER ROHRBACK L.L.P.

MORGAN, LEWIS & BOCKIUS, LLP

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7 By: /s/ Matthew M. Gerend
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ATTESTATION

I, Nicole A. Diller, am the ECF User whose ID and password are being used to file this Stipulation. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Matthew Gerend has concurred in this filing. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 27th day of February 2014, at San Francisco, CA.

/s/ Nicole A. Diller
Nicole A. Diller

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[PROPOSED] ORDER

Pursuant to the parties' stipulation set forth above, and good cause appearing,

1. Defendants shall have until March 20, 2014 to file their Opposition to the Motion for Partial Summary Judgment ("Motion");
2. Rollins shall have until April 3, 2014 to file her Reply in support of the Motion;
3. The hearing on the Motion shall be continued to April 14, 2014 at 10:00 a.m.; and
4. Neither Rollins nor Defendants shall be deemed to have waived or otherwise relinquished any rights to seek further extensions of time to file briefing related to the Motion or continuances of the hearing on the Motion.

IT IS SO ORDERED.

DATED this 4th day of March, 2014.



HONORABLE THELTON E. HENDERSON
UNITED STATES DISTRICT JUDGE