

1 R. Craig Clark (SBN 129219)  
2 James M. Treglio (SBN 228077)  
3 Tessa R. Lessner (SBN 293610)

**CLARK & TREGLIO**

4 205 W Date Street  
5 San Diego, CA 92101  
6 Telephone: (619) 239-1321  
7 Facsimile: (888) 273-4554

8 Sharon B. Bauman (Bar No. CA 179312)  
9 E-mail: sbauman@manatt.com  
10 Christopher A. Rheinheimer (Bar. No. CA 253890)  
11 E-mail: CRheinheimer@manatt.com

**MANATT, PHELPS & PHILLIPS, LLP**

12 One Embarcadero Center, 30th Floor  
13 San Francisco, CA 94111  
14 Telephone: (415) 291-7400  
15 Facsimile: (415) 291-7474

16 Attorneys for Plaintiff and the Class

17 [ADDITIONAL COUNSEL LISTED ON THE NEXT PAGE]

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

18 RONIE RICHIE, an individual, on  
19 behalf of herself, and those similarly  
20 situated and on behalf of the general  
21 public,

22 Plaintiffs,

23 v.

24 BLUE SHIELD OF CALIFORNIA, and  
25 DOES 1 through 100, Inclusive.

26 Defendants.

) Case No. CV 13 2693 EMC  
)  
) Assigned to Judge Edward M. Chen

**CLASS ACTION**

**JOINT STIPULATION  
EXTENDING TIME FOR  
PLAINTIFF'S FILING A CLASS  
CERTIFICATION MOTION AND  
[PROPOSED] ORDER THEREON**

**JOINT STIPULATION EXTENDING TIME FOR PLAINTIFF'S FILING A CLASS CERTIFICATION  
MOTION AND [PROPOSED] ORDER THEREON**

1 David Markham (CSB No. 71814)

2 **THE MARKHAM LAW FIRM**

3 750 B St, Suite 1950

4 San Diego, CA 92101

5 Telephone: (619) 399-3995

6 dmarkham@markhamlaw.com

7 Walter Haines (SBN 071075)

8 walter@walterhaines.com

9 **UNITED EMPLOYEES LAW GROUP**

10 5500 Bolsa Ave Suite 201

11 Huntington Beach, CA 92649

12 Telephone: (877) 696-8378

13 Facsimile: (562) 256-1006

14 Andrew L. Satenberg (Bar No. CA 174840)

15 E-mail: ASatenberg@manatt.com

16 **MANATT, PHELPS & PHILLIPS, LLP**

17 11355 West Olympic Boulevard

18 Los Angeles, CA 90064-1614

19 Telephone: (310) 312-4000

20 Facsimile: (310) 312-4224

1 WHEREAS, on October 10, 2013, the Court ordered Plaintiff to file her  
2 Motion for Class Certification by April 24, 2014 (See Civil Minute Order, dated  
3 October 10, 2013);

4 WHEREAS, on February 1, 2014, Laura M. Cotter, the lead attorney  
5 handling Plaintiff's case, unexpectedly left the Clark & Treglio firm;

6 WHEREAS, Ms. Cotter's sudden and unplanned departure hampered  
7 Plaintiff's ability to conduct all necessary pre-certification discovery, including  
8 previously noticed depositions of Defendant's employees;

9  
10 WHEREAS, the noticed depositions still need to be completed, and, due to  
11 time constraints, cannot be completed prior to the April 24, 2014 certification  
12 motion deadline;

13 WHEREAS, the Parties have agreed, by and through their attorneys of  
14 record, that the filing date for Plaintiff's Motion for Class Certification should be  
15 extended until May 27, 2014;

16 WHEREAS, the Parties further have agreed and hereby request the Court  
17 hold a status conference one week after May 27, 2014, on or about June 3, 2014,  
18 to allow the Parties to meet and confer regarding a proposed briefing schedule in  
19 response to Plaintiff's Certification Motion;

20 THEREFORE, subject to the approval of the Court, Named Plaintiff  
21 RONIE RITCHIE ("Plaintiff") and Defendant BLUE SHIELD OF  
22 CALIFORNIA ("Defendant"), through their respective counsel, hereby enter into  
23 the following stipulation:

24 1. Plaintiff shall file her Motion for Class Certification on or before  
25 May 27, 2014;

26  
27 2. A status conference to set a briefing schedule in response to

28  

---

**JOINT STIPULATION EXTENDING TIME FOR PLAINTIFF'S FILING A CLASS CERTIFICATION  
MOTION AND [PROPOSED] ORDER THEREON**

1 Plaintiff's Motion for Class Certification shall be held approximately one week  
2 later, on or about June 3, 2014.

3  
4 Dated: April \_\_\_\_, 2014

**Clark & Treglio**

5  
6  
7 By: \_\_\_\_\_  
8 R. Craig Clark  
9 James M. Treglio  
10 Attorneys for Plaintiff,  
11 Ronie Richie

11 Dated: April 9, 2014

**Manatt, Phelps & Phillips, LLP**

12  
13  
14 By:   
15 Christopher A. Rheinheimer  
16 Attorneys for Defendant  
17 Blue Shield of California  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

1 Plaintiff's Motion for Class Certification shall be held approximately one week  
2 later, on or about June 3, 2014.

3

4 Dated: April 10, 2014

**Clark & Treglio**

5

6

7

By: /s/ James M. Treglio  
R. Craig Clark  
James M. Treglio  
Attorneys for Plaintiff,  
Ronie Richie

8

9

10

11

12 Dated: April \_\_\_\_, 2014

**Manatt, Phelps & Phillips, LLP**

13

14

15

By: \_\_\_\_\_  
Christopher A. Rheinheimer  
Attorneys for Defendant  
Blue Shield of California

16

17

18

19

20

21

22

23

24

25

26

27

28

---

JOINT STIPULATION EXTENDING TIME FOR PLAINTIFF'S FILING A CLASS CERTIFICATION  
MOTION AND [PROPOSED] ORDER THEREON

~~[PROPOSED]~~ ORDER

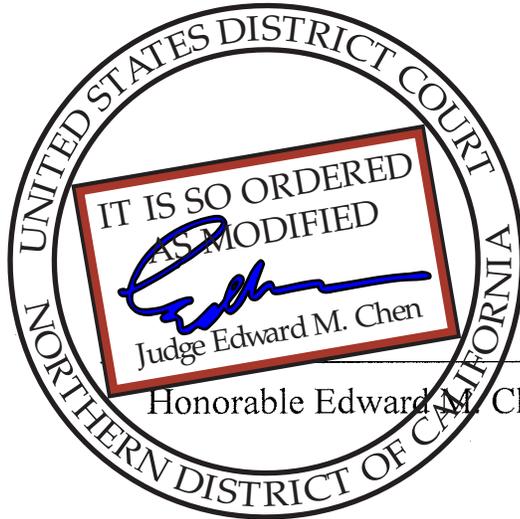
Based on the Parties' Stipulation and good cause appearing, the Court orders as follows:

1. Plaintiff shall file her Motion for Class Certification on or before May 27, 2014;

2. A status conference shall be held on approximately one week later, on June 5, 2014 10:30 a.m. to set a briefing schedule in response to Plaintiff's Motion for Class Certification.

**IT IS SO ORDERED.**

Dated: April 10, 2014



Honorable Edward M. Chen

312064321.1

DECLARATION OF SERVICE

RONIE RICHIE v. BLUE SHIELD OF CALIFORNIA
United States District Court-Central District Case No. CV13 2693 EMC

I am employed in the county of San Diego, State of California. I am over the age of 18 and not a party to this action. My business address is 205 w Date Street, San Diego, CA 92101. On April 10, 2014, I served the document(s) described as:

(1) JOINT STIPULATION EXTENDING TIME FOR PLAINTIFF'S FILING A CLASS CERTIFICATION MOTION AND [PROPOSED] ORDER THEREON

on the following interested parties and in the manner as follows:

Manatt, Phelps & Phillips, LLP
Sharon B. Bauman (Bar No. CA 179312)
E-mail: sbauman@manatt.com
Christopher A. Rheinheimer (Bar. No. CA 253890)
E-mail: CRheinheimer@manatt.com
One Embarcadero Center, 30th Floor
San Francisco, CA 94111
Telephone: (415) 291-7400
Facsimile: (415) 291-7474

Manatt, Phelps & Phillips, LLP
Andrew L. Satenberg (Bar No. CA 174840)
E-mail: ASatenberg@manatt.com
11355 West Olympic Boulevard
Los Angeles, CA 90064-1614
Telephone: (310) 312-4000
Facsimile: (310) 312-4224

Attorneys for Defendant
BLUE SHIELD OF CALIFORNIA

[X] BY ELECTRONIC ACCESS: pursuant to Electronic Filing General Order 08-02 and Local Rule 5-4, I hereby certify that the above documents were uploaded to the ECF website and will be posted on the Website by the close of the next business day and the webmaster will give e-mail notification to all parties.

[ ] BY U.S. MAIL: by placing the document(s) listed above in a sealed envelope for collection and mailing following our ordinary business practices. I am readily familiar with our ordinary business practices for collecting and processing mail for the United States Postal Service, and mail that I place for collection and processing is regularly deposited with the United States Postal Service that same day with postage prepaid.

[ ] BY PERSONAL SERVICE: by causing the document(s) listed above to be delivered by hand to offices of the addressee(s).

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

- BY FACSIMILE:** by causing to be transmitted via facsimile the document(s) listed above to the addressee(s) at the facsimile number(s) set forth above.
- BY OVERNIGHT DELIVERY:** by enclosing the document(s) in an envelope or package provided by an overnight delivery carrier and addressed to the person(s) at the addresses listed above. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this Declaration was executed on April 10, 2014, at San Diego, California.

/s/ Elizabeth Wilton  
Elizabeth Wilton