

1 SEYFARTH SHAW LLP  
 Christian J. Rowley (SBN 187293)  
 2 Jason Allen (SBN 284432)  
 560 Mission Street, 31st Floor  
 3 San Francisco, California 94105  
 Telephone: (415) 397-2823  
 4 Facsimile: (415) 397-8549  
 crowley@seyfarth.com

5  
 Richard L. Alfred (SBN 015000) (pro hac vice)  
 6 Jessica S. Lieberman (SBN 669677) (pro hac vice)  
 Two Seaport Lane, Suite 300  
 7 Boston, Massachusetts 02210  
 Telephone: (617) 496-4802  
 8 Facsimile: (617) 946-4801  
 9 ralfred@seyfarth.com

10 Attorneys for Defendants

11  
 12 **UNITED STATES DISTRICT COURT**  
 13 **NORTHERN DISTRICT OF CALIFORNIA**

14 ROSE FEAVER, an individual,  
 15 MYUNGSHUN SHIM, an individual,  
 16 ARTIN ADAMIAN, an individual,  
 individually, and on behalf of all others  
 similarly situated,

17 Plaintiffs,

18 v.

19  
 20 KAISER FOUNDATION HEALTH PLAN,  
 INC., KAISER FOUNDATION HOSPITALS,  
 21 and Does 1 through 50, Inclusive

22 Defendants.

) CASE NO.: 3:15-CV-00890-EMC

) Assigned To: Hon. Edward M. Chen

) **CLASS AND COLLECTIVE ACTION**

) **STIPULATION REGARDING  
DEADLINE TO SUBMIT JOINT CASE  
MANAGEMENT STATEMENT**

23  
24  
25 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

26 Defendants Kaiser Foundation Health Plan, Inc. and Kaiser Foundation Hospitals, Inc.  
 27 (collectively “Defendant”) and Plaintiffs Rose Feaver, Artin Adamian, and Myungsun Shim  
 28 (collectively “Plaintiffs”) (together, the “Parties”), by and through their respective counsel of

1 record, hereby stipulate as follows:

2 1. On January 5, 2016, the Court set a case management conference for February 18,  
3 2016, and instructed the Parties to file an updated joint case management statement by February  
4 11, 2016 (docket no. 38).

5 2. In its Order dated January 27, 2016 granting Plaintiffs' motion for conditional  
6 certification (docket no. 39), this Court instructed the Parties to file by February 16, 2016 a  
7 stipulation governing notice to the conditionally certified collective.

8 3. The case deadlines that the Parties anticipate addressing in the updated joint case  
9 management statement are dependent in part on the timeline for notice to the conditionally  
10 certified collective, which the Parties will address in the joint stipulation regarding notice due  
11 February 16, 2016.

12 4. For this reason, the Parties request an extension of time to file the joint case  
13 management statement through February 16, 2016, which would allow them to complete and file  
14 the two documents together.

15 Dated: February 10, 2016

SEYFARTH SHAW, LLP

17 By: Jessica S. Lieberman  
18 Jessica S. Lieberman (pro hac vice)  
19 Attorneys for Defendant

20 Dated: February 10, 2016

KEARNEY LITTLEFIELD, LLP  
STONEBARGER LAW, APC

22 By: Prescott W. Littlefield  
23 Prescott W. Littlefield  
24 Attorneys for Plaintiff

25  
26 I, Jessica S. Lieberman, hereby attest that pursuant to LR 5-1(i) I have on file concurrence for  
27 any signatures indicated by a "conformed" signature (/s/) within this e-filed document.

28 /s/ Jessica S. Lieberman  
Jessica S. Lieberman

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

**[PROPOSED] ORDER**

IT IS SO ORDERED.

Dated: 2/16/16

