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6 Attorneys for Defendant
 BLUE CROSS AND BLUE SHIELD OF NORTH
 7 CAROLINA

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

10 SETON MEDICAL CENTER, a California
 non-profit religious corporation,

Case No. 15-cv-06254-JCS

11 Plaintiff,

12 vs.

13 BLUE CROSS AND BLUE SHIELD OF
 NORTH CAROLINA, a North Carolina
 14 non-profit corporation; and DOES 1
 THROUGH 25, INCLUSIVE,

**STIPULATION TO EXTEND
 DEFENDANT BLUE CROSS AND BLUE
 SHIELD OF NORTH CAROLINA'S
 TIME TO ANSWER, MOVE OR
 OTHERWISE RESPOND TO
 PLAINTIFF'S COMPLAINT**

15 Defendants.
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 2041 ROSECRANS AVENUE
 EL SEGUNDO, CALIFORNIA 90245

17 Pursuant to Civil Local Rule 6-1(a), Plaintiff, Seton Medical Center ("Plaintiff"),
 18 and Defendant Blue Cross and Blue Shield of North Carolina ("BCBSNC"), by and through
 19 their respective counsel of record, hereby stipulate as follows:

20 Plaintiff served its state court Complaint on November 25, 2015;

21 BCBSNC removed this civil action, Case No. CIV536368, from the Superior Court
 22 of the State of California, for the County of San Mateo, to the United States District Court,
 23 for the Northern District of California, based upon diversity on December 29, 2015;

24 A responsive pleading to the Complaint was due to be filed and served on behalf of
 25 BCBSNC on or before January 5, 2016;

26 The parties stipulated to, and the Court granted, an extension of time of an additional
 27 27 days to and including February 1, 2016 for BCBSNC to answer, move or otherwise
 28 respond to the Complaint;

1 The parties are engaged in settlement negotiation and in order to facilitate further
2 settlement discussions, BCBSNC has requested and Plaintiff has granted an additional 30
3 days to and including March 1, 2016 for BCBSNC to answer, move or otherwise respond to
4 the Complaint;

5 The next Court ordered deadline is on March 11, 2016 for the parties to meet and
6 confer re initial disclosures and early settlement. An additional 30 days for BCBSNC to
7 answer or respond to Plaintiff's Complaint will not alter the date of any event or any
8 deadline already fixed by Court order;

9 Therefore, IT IS HEREBY STIPULATED by and between Plaintiff and BCBSNC,
10 by and through their respective attorneys of record, that BCBSNC shall answer, move or
11 otherwise respond to Plaintiff's Complaint on or before March 1, 2016.

12
13 Dated: January 26, 2016

STEPHENSON, ACQUISTO & COLMAN
Melanie Joy Stephenson
Barry Sullivan
Richard A. Lovich
Karlene J. Rogers Aberman
Christine V. Nitoff

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18 By: /s/ Christine V. Nitoff
Christine V. Nitoff
Attorneys for Plaintiff
SETON MEDICAL CENTER

19
20
21 Dated: January 26, 2016

VON BEHREN & HUNTER LLP
William E. von Behren
Joann Lee

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24 By: /s/ Joann Lee
Joann Lee
Attorneys for Defendant
BLUE CROSS AND BLUE SHIELD
OF NORTH CAROLINA

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27 Dated: January 27, 2016

