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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.

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

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

15 Defendants.  
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VON BEHREN & HUNTER LLP  
 2041 ROSECRANS AVENUE  
 EL SEGUNDO, CALIFORNIA 90245

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 18 Pursuant to Civil Local Rule 6-1(a), Plaintiff, Seton Medical Center (“Plaintiff”),  
 19 and Defendant Blue Cross and Blue Shield of North Carolina (“BCBSNC”), by and through  
 20 their respective counsel of record, hereby submit this stipulation based on the following:

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

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

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

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1 The parties stipulated to, and the Court granted, an extension of time of an additional  
2 27 days to and including February 1, 2016 for BCBSNC to answer, move or otherwise  
3 respond to the Complaint;

4 The parties subsequently stipulated to, and the Court granted, an extension of time of  
5 an additional 30 days to and including March 1, 2016 for BCBSNC to answer, move or  
6 otherwise respond to the Complaint;

7 The parties are engaged in settlement negotiations and in order to facilitate further  
8 settlement discussions, BCBSNC has requested and Plaintiff has agreed to an additional 15  
9 days to and including March 15, 2016 for BCBSNC to answer, move or otherwise respond  
10 to the Complaint;

11 The next Court ordered deadline is on March 11, 2016 for the parties to meet and  
12 confer re initial disclosures and early settlement. An additional 15 days for BCBSNC to  
13 answer or respond to Plaintiff's Complaint will not alter the date of any event or any  
14 deadline already fixed by Court order, as the parties will meet and confer notwithstanding  
15 any extension to respond to the Complaint;

16 Therefore, IT IS HEREBY STIPULATED by and between Plaintiff and BCBSNC,  
17 by and through their respective attorneys of record, that BCBSNC shall have until on or  
18 before March 15, 2016 to answer, move or otherwise respond to Plaintiff's Complaint.

19  
20 Dated: February 24, 2016

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

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

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Dated: February 24, 2016

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

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

Dated: 2/25/16



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