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Counsel for Plaintiff and the Proposed Classes

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

C.M., individually, and on behalf of all others
similarly situated,

Plaintiff,

vs.

MARINHEALTH MEDICAL GROUP, INC.

Defendant.

Case No.: 23-cv-04179-WHO

CLASS ACTION

Assigned to Hon. William H. Orrick

**JOINT STIPULATION AND [~~PROPOSED~~]
ORDER TO MODIFY THE BRIEFING
SCHEDULE RE: DEFENDANT
MARINHEALTH MEDICAL GROUP,
INC.'S MOTION TO DISMISS CLAIMS 6-9
OF THE COMPLAINT**

[Proposed Order filed concurrently herewith]

Complaint Filed: August 16, 2023
Trial Date: None

1 Through their undersigned counsel, Plaintiff C.M. (“**Plaintiff**”) and Defendant MarinHealth
2 Medical Group, Inc. (“**Defendant**”) (collectively the “**Parties**”) jointly request that the Court
3 modify the briefing schedule on Defendant’s Motion to Dismiss (DKT. No. 22). In support of their
4 stipulated request, the counsel for the Parties declare as follows:

5 1. WHEREAS, On November 7, 2023, Defendant filed its Motion to Dismiss Plaintiff’s
6 Claims 6-9 (DKT. 22), which is set for hearing on January 17, 2023, before the Honorable William
7 H. Orrick;

8 2. WHEREAS, pursuant to Local Rule 7-3(a), Plaintiff’s Opposition to Defendant’s
9 Motion is currently due on November 21, 2023;

10 3. WHEREAS, pursuant to Local Rule 7-3(c), Defendant’s Reply Brief in support of its
11 Motion is currently due on November 28, 2023;

12 4. WHEREAS, on November 8, 2023, Plaintiff’s counsel conferred with Defense counsel,
13 requesting a three (3) week extension in time to file Plaintiff’s Opposition to the Motion to Dismiss
14 due to scheduling conflicts. Defendant’s counsel agreed to Plaintiff’s extension request.

15 5. The requested extension will not prejudice either party.

16 **NOW, THEREFORE**, the Parties hereby jointly stipulate that the Court approve the
17 Parties’ proposed briefing schedule associated with Defendant’s Motion, as follows:

- 18 a. Plaintiff’s Opposition to Defendant’s Motion to Dismiss shall be filed on or
19 before December 12, 2023; and
- 20 b. Defendant’s Reply in Support of its Motion to Dismiss shall be filed on or
21 before December 28, 2023.
- 22 c. The hearing on Motion to Dismiss currently set for January 17, 2024, shall
23 remain unchanged.

24 **IT IS SO STIPULATED.**

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DATED: November 14, 2023

CLARKSON LAW FIRM, P.C.

/s/ Yana Hart
Yana Hart, Esq.
Ryan Clarkson, Esq.
Tiara Avanness, Esq.
Valter Malkhasyan, Esq.

DATED: November 14, 2023

**CONSTANGY, BROOKS, SMITH &
PROPHETE, LLP**

/s/ David Yudelson
David Yudelson, Esq.
Sydney Wright, Esq.
Catlyn Wiegand, Esq.
Samuel Park, Esq.

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ATTESTATION UNDER LOCAL RULE 5-1(i)(3)

Pursuant to Civil Local Rule 5-1(i)(3), the undersigned filer hereby attests that all signatories listed, and on whose behalf the filing is submitted, concur in the filing’s content and have authorized the filing.

DATED: November 14, 2023

CLARKSON LAW FIRM, P.C.

/s/ Yana Hart _____

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[PROPOSED] ORDER

The Court having reviewed and considered the Parties' Joint Stipulation to (1) Modify Briefing Schedule on Defendant's Motion to Dismiss, and good cause appearing, hereby grants the Joint Stipulation as follows:

- a. Plaintiff's Opposition to Defendant's Motion to Dismiss shall be filed on or before December 12, 2023; and
- b. Defendant's Reply in Support of its Motion to Dismiss shall be filed on or before December 28, 2023.
- c. The hearing on Motion to Dismiss currently set for January 17, 2024, shall remain unchanged.

IT IS SO ORDERED.

DATE: November 14, 2023



William H. Orrick
United States District Judge