

1 CROWELL & MORING LLP  
 Jennifer S. Romano (CSB No. 195953, jromano@crowell.com)  
 2 Nathaniel J. Wood (CSB No. 223547, nwood@crowell.com)  
 515 South Flower St., 40th Floor  
 3 Los Angeles, California 90071  
 Telephone: 213.622.4750  
 4 Facsimile: 213.622.2690

5 CROWELL & MORING LLP  
 Ethan P. Schulman (CSB No. 112466, eschulman@crowell.com)  
 6 Steven E. Wilson (CSB No. 240843, swilson@crowell.com)  
 275 Battery Street, 23rd Floor  
 7 San Francisco, California 94111  
 Telephone: 415.986.2800  
 8 Facsimile: 415.986.2827

9 Attorneys for Defendants HEALTH NET, INC.  
 and HEALTH NET OF CALIFORNIA, INC.

11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA  
 13 OAKLAND DIVISION

15 CATHERINE EANDI, on behalf of herself  
 and all others similarly situated,

16 Plaintiff,

17 v.

18 HEALTH NET, INC. OF CALIFORNIA;  
 19 HEALTH NET, INC.; IBM  
 CORPORATION; DOES 1-25, inclusive,

20 Defendants.  
 21

Case No. CV 11-2002 LB

**STIPULATION TO EXTEND TIME IN  
 WHICH TO ANSWER OR OTHERWISE  
 RESPOND TO THE COMPLAINT AND IN  
 WHICH TO FILE AN AMENDED  
 COMPLAINT; [~~PROPOSED~~] ORDER**

22 **I. STIPULATION**

23 WHEREAS, Defendants Health Net of California, Inc. and Health Net, Inc. (together,  
 24 “Health Net”) filed a notice of removal of this action on April 25, 2011;

25 WHEREAS, Federal Rule of Civil Procedure 81(c)(2) provides that Defendants’ deadline  
 26 to answer or otherwise respond to Plaintiff’s Complaint is within 7 days after the notice of  
 27 removal is filed, *i.e.*, May 2, 2011;  
 28

1 WHEREAS, Health Net's counsel has requested a 30-day extension of each defendant's  
2 time to prepare and file its Answer or other response to Plaintiff's Complaint and said extension  
3 will not alter the date of any event or deadline already fixed by Court order;

4 WHEREAS, Federal Rule of Civil Procedure 15(a)(1)(B) provides that Plaintiff may file  
5 an amended complaint as a matter of course within 21 days after Defendants' responsive  
6 pleadings are served;

7 WHEREAS, Plaintiff's counsel has requested and Defendants have agreed to provide  
8 Plaintiff 35 days to file an amended complaint after receipt of Defendants' responsive pleadings;

9 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE THAT  
10 pursuant to Civil Local Rule 6-1(a), the time within which all Defendants shall file their  
11 Answer(s) or other response(s) to Plaintiff's Complaint in this action shall be extended to June 2,  
12 2011. This extension will not alter the date of any event or any deadline already fixed by Court  
13 order, and thus need not be approved by the Court pursuant to Civil Local Rule 6-1(a).

14 The time in which Plaintiff may file an amended complaint after receipt of Defendants'  
15 Answer(s) or other response(s) shall be extended to July 7, 2011. An order approving the  
16 extension of time to file an amended complaint appears below.

17 Dated: April 27, 2011

CROWELL & MORING LLP

18  
19 /s/

20 Ethan P. Schulman  
21 Attorneys for Defendants  
22 HEALTH NET, INC. and HEALTH NET OF  
23 CALIFORNIA, INC.  
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Dated: April 27, 2011

QUINN EMANUEL URQUHART & SULLIVAN  
LLP

/s/

Karin Kramer  
Attorneys for Defendant  
IBM CORP.

Dated: April 27, 2011

GIRARD GIBBS LLP

/s/

Eric H. Gibbs  
Attorneys for Plaintiff  
CATHERINE EANDI

Pursuant to General Order 45 Section X.B, the above signatories concur in the filing of this document.

**II. ORDER**

Pursuant to the stipulation of the parties, the Court hereby ORDERS that the time in which Plaintiff may file an amended complaint after receipt of Defendants' Answer(s) or other response(s) shall be extended to July 7, 2011.

**IT IS SO ORDERED.**

DATED: May 3, 2011



LAUREL BEELER  
United States Magistrate Judge