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	Attorneys for Plaintiffs and the Proposed Class		
	UNITED STATE DISTRICT COURT		
	NORTHERN DISTRICT OF CALIFORNIA		
	AUDREY HEREDIA as successor-in-interest to the Estate of Carlos Heredia; and CORBINA MANCUSO as successor-in-interest to the Estate of Ruby Mancuso; on their own behalves	CASE NO. 4:18-cv-00616-HSG	
		STIPULATION AND ORDER TO EXTEND DEADLINE TO RESPOND	
	and on behalf of others similarly situated,	TO FIRST AMENDED CLASS ACTION COMPLAINT	
	Plaintiffs,	Location: Courtroom 2, 4th Floor,	
	v.	1301 Clay Street, Oakland, CA 94162 Judge: Honorable Haywood S. Gilliam, Jr.	
	SUNRISE SENIOR LIVING, LLC; and DOES 1 - 100,	Action Filed: June 27, 2017 Trial Date: None Set	
	Defendants.		

STIPULATION AND ORDER TO EXTEND DEADLINE TO RESPOND TO FIRST AMENDED CLASS ACTION COMPLAINT

1	<b>STIPULATION</b>		
2	WHEREAS, Plaintiffs Audrey Heredia as successor-in-interest to the Estate of Carlos		
3	Heredia; and Corbina Mancuso as successor-in-interest to the Estate of Ruby Mancuso		
4	("Plaintiffs") filed their Class Action Complaint on June 27, 2017, in the Superior Court of		
5	California, County of Alameda;		
6	WHEREAS, Defendant Sunrise Senior Living, LLC ("Defendant") removed the case to		
7	this Court on January 29, 2018;		
8	WHEREAS, on February 5, 2018, Defendant filed a Motion to Compel Arbitration or to		
9	Dismiss Pursuant to Federal Rule of Civil Procedure 12(b)(3); or to Transfer Venue Pursuant to		
10	28 U.S.C. § 1404(A); or to Dismiss Pursuant to Federal Rule of Civil Procedure 12(b)(6) and 9(b)		
11	or to Stay (collectively, "Defendant's Motions"), which are presently set for hearing on May 10,		
12	2018, at 2:00 p.m.;		
13	WHEREAS, Plaintiffs filed a First Amended Class Action Complaint on February 23,		
14	2018;		
15	Subject to Court approval, IT IS HEREBY STIPULATED:		
16	1. The current hearing date of May 10, 2018 for Defendant's Motions, and the dates		
17	for opposition and reply briefing regarding those Motions, shall be vacated.		
18	2. Defendant's motion, answer or other response to the First Amended Complaint		
19	shall be filed and served on or before March 30, 2018.		
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	ACTION COMPLAINT		
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1	3. Assuming Defendant files a pleading challenge or other motion with respect to the				
2	First Amended Complaint, any such motion shall be set for hearing by the Court on June 7, 2018,				
3	with opposition briefing filed and served on or before April 30, 2018 and reply briefing filed and				
4	served on or before May 21, 2018.				
5	I, Christopher J. Healey, hereby certify that the content of this document is acceptable to				
6	Rachel S. Brass, counsel for Sunrise Senior Living, LLC, and that I have obtained Ms. Brass's				
7	authorization to affix her electronic signature on this document.				
8	IT IS SO STIPULATED:				
9		/S/ Christopher J. Healey			
10	Dated: March 1, 2018	Christopher J. Healey, State Bar No. 105798 DENTONS US LLP			
11		4655 Executive Drive, Suite 700 San Diego, CA 92121-3128			
12		Attorneys for Plaintiff and the Proposed Class			
13		[Additional Counsel listed on service page]			
14		[raditional counser listed on set free page]			
15					
16	Dated: March 1, 2018	/S/ Rachel S. Brass Rachel S. Brass, State Bar No. 219301			
17		Laura A. Sucheski, State Bar No. 302445			
18		Gibson, Dunn & Crutcher LLP 555 Mission Street			
19		San Francisco, CA 94105-0921			
20		Attorneys for SUNRISE SENIOR LIVING, LLC			
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22	<u>ORDER</u>				
23	Pursuant to the parties' stipulation, IT IS SO ORDERED. This order terminates docket no.				
24	15.				
25		Starwood & full			
26	Dated: March 6, 2018	Honorable Haywood S. Gilliam, Jr. Judge of the United States District Court			
27		suage of the Office States District Court			
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	STIPULATION AND ORDER TO EXTEND DEADLINE TO RESPOND TO FIRST AMENDED CLASS ACTION COMPLAINT				