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10 GROUP, INC.; KNOWLES SURGERY
11 CENTER, LLC, NATIONAL AMBULATORY
12 SURGERY CENTER, LLC, LOS ALTOS
13 SURGERY CENTER, LP, FOREST
14 AMBULATORY SURGICAL
15 ASSOCIATES, LP, and SOAR SURGERY
16 CENTER, LLC



12/18/2013

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

13 BAY AREA SURGICAL GROUP, INC.;
14 KNOWLES SURGERY CENTER, LLC;
15 NATIONAL AMBULATORY SURGERY
16 CENTER, LLC; LOS ALTOS SURGERY
17 CENTER, LP; FOREST AMBULATORY
18 SURGICAL ASSOCIATES, LP; SOAR
19 SURGERY CENTER, LLC,

20 Plaintiffs,

21 vs.

22 AETNA LIFE INSURANCE COMPANY, *et*
23 *al.*,

24 Defendants.

CASE NO. 13-CV-05430 EJD

**STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT
(L.R. 6-1(a))**

Complaint Filed: November 22, 2013

Trial Date: None set

13-CV-05430 EJD

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1 Plaintiffs Bay Area Surgical Group, Inc., Knowles Surgery Center, LLC, National
2 Ambulatory Surgery Center, LLC, Los Altos Surgery Center, LP, Forest Ambulatory Surgical
3 Associates, LP, and SOAR Surgery Center, LLC ("Plaintiffs") and Defendants The Kleinfelder
4 Group, Inc. and The Kleinfelder Group, Inc. Health and Welfare Plan (the "Kleinfelder
5 Defendants"), through their undersigned counsel of record, hereby stipulate to extend the date for
6 the Kleinfelder Defendants to answer or otherwise respond to Plaintiffs' initial complaint (the
7 "Complaint") in this matter as follows:

8
9 WHEREAS, the Complaint was filed on November 22, 2013;

10 WHEREAS, the Kleinfelder Defendants were served with the Complaint by personal
11 service on November 26, 2013;

12 WHEREAS, the Kleinfelder Defendants' deadline to answer or otherwise respond to the
13 Complaint is December 17, 2013;

14 WHEREAS, the Kleinfelder Defendants have requested an extension of time to answer or
15 otherwise respond to the Complaint;

16 WHEREAS, Plaintiffs have agreed to extend the time for the Kleinfelder Defendants to
17 answer or otherwise respond to the Complaint until January 10, 2014;
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1 NOW THEREFORE, IT HEREBY IS STIPULATED by and between Plaintiffs and the
2 Kleinfelder Defendants, through their counsel of record, that the deadline for the Kleinfelder
3 Defendants to answer or otherwise respond to the Complaint shall be extended until **January 10,**
4 **2014.**

5 IT IS SO STIPULATED.

6
7 DATED: December 17, 2013

HOOPER, LUNDY & BOOKMAN, P.C.

8
9
10 By: 

KATHERINE M. DRURY

11 Attorneys for Plaintiffs BAY AREA SURGICAL GROUP,
12 INC.; KNOWLES SURGERY CENTER, LLC,
13 NATIONAL AMBULATORY SURGERY CENTER,
14 LLC, LOS ALTOS SURGERY CENTER, LP, FOREST
15 AMBULATORY SURGICAL ASSOCIATES, LP and
16 SOAR SURGERY CENTER, LLC

17 DATED: December 17, 2013

JACKSON LEWIS P.C.

18 By: 

CYNTHIA J. EMRY

19 Attorneys for Defendants THE KLEINFELDER
20 GROUP, INC. and THE KLEINFELDER GROUP,
21 INC. HEALTH AND WELFARE PLAN
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