1 The Honorable Kymberly K. Evanson 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 UNITED STATES OF AMERICA, ex rel. CASE NO. 2:21-cv-0410-KKE KUSHWINDER SINGH. 10 STIPULATED MOTION AND ORDER Plaintiff. FOR EXTENSION OF THE TIME 11 FOR DEFENDANT ALEDADE, INC. TO RESPOND TO THE COMPLAINT v. 12 ALEDADE, INC., et. al., NOTE ON MOTION CALENDAR: 13 **JUNE 5, 2024** Defendants. 14 15 Plaintiff Kushwinder Singh ("Plaintiff") and Defendant Aledade, Inc. ("Defendant") 16 (collectively, "the Parties"), by and through their counsel of record, respectfully submit this 17 Stipulation, and respectfully request that the Court enter the proposed order for an extension of 18 time for Defendant to respond to Plaintiff's Complaint. 19 1. On January 10, 2024, the Court unsealed the Amended Complaint against 20 Defendant in the above-captioned action. (Dkt. No. 24). 21 2. On April 8, 2024, Defendant executed a Waiver of the Service of Summons. (Dkt. 22 No. 27). 23 3. Defendant's deadline to respond to Plaintiff's Complaint is June 7, 2024. 24 4. The Parties are engaged in discussions regarding whether they may streamline and 25 narrow the litigation. 26 27 STIPULATED MOTION AND ORDER FOR EXTENSION OF THE TIME TO RESPOND TO COMPLAINT - 1 Corr Cronin, LLP (No. 2:21-cy-0410-KKE) 1015 Second Avenue, Floor 10 Seattle, WA 98104-1001

(206) 625-8600

1	5. An extens	sion would further judicial economy and no party will be prejudiced by an	
2	extension.		
3	6. The Parti	es jointly request a 45-day extension of Defendant's deadline to respond	
4	to the Complaint to facilitate these discussions.		
5	7. Accordingly, the Parties stipulate and respectfully request to extend Defendant's		
6	deadline to respond to Plaintiff's Complaint to July 22, 2024. A proposed order is subjoined		
7	herewith.		
8	DATED this 5th day of June, 2024. I certify that this memorandum contains 173 words,		
9	in compliance with the Local Civil Rules.		
10	Respectfully submitted,		
11			
12	127	By: /s/ Jeffrey B. Coopersmith	
13		Jeffrey B. Coopersmith, WSBA No. 30954 CORR CRONIN, LLP	
14	Deathe, 11 1 10 12	21 Seattle, WA 98104-1001	
15	(206) 324-8969 Steve@stellerlaw	(206) 625-8600 y.com jcoopersmith@corrcronin.com	
16		ntiff Brian P. Dunphy (Pro Hac Vice forthcoming)	
17	Kushwinder Sing	MINTZ, LEVIN, COHN, FERRIS,	
18	3	GLOVSKY AND POPEO, P.C. One Financial Center	
19)	Boston, MA 02111 (617) 542-6000	
20)	BDunphy@mintz.com NEHenry@mintz.com	
21		Karen S. Lovitch (Pro Hac Vice forthcoming)	
22	2	MINTZ, LEVIN, COHN, FERRIS, GLOVSKY AND POPEO, P.C.	
23	3	555 12th Street NW Suite 1100	
24	1	Washington, DC 20004 (202) 434-7300	
25	5	kslovitch@mintz.com	
26	5	Attorneys for Defendant Aledade, Inc.	
27	7		

1		ODDED
1	IT IC CO ODDEDED	ORDER
2	IT IS SO ORDERED.	
3	DATED this 5th day of June, 2024.	
4		
5		Hymberly X Eanson
6		
7		Kymberly K. Evanson United States District Judge
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		

27