

1 Dan Stormer, Esq. (SBN 101967)
2 **HADSELL STORMER & RENICK LLP**
3 128 N. Fair Oaks Avenue
4 Pasadena, California 91103
5 Telephone: (626) 585-9600
6 Facsimile: (626) 577-7079
7 dstormer@hadsellstormer.com

8 Lori Rifkin, Esq. (SBN 244081)
9 **HADSELL STORMER & RENICK LLP**
10 4300 Horton Street, #15
11 Emeryville, California 94608
12 Telephone: (626) 585-9600
13 Facsimile: (626) 577-7079
14 lrifkin@hadsellstormer.com

15 *Attorneys for Plaintiffs*

16 Roger A. Cerda (SBN 239027)
17 **ALSTON & BIRD LLP**
18 333 South Hope Street
19 Sixteenth Floor
20 Los Angeles, California 90071
21 Telephone: (213) 576-1000
22 Facsimile: (213) 576-1100
23 roger.cerda@alston.com

24 Brian D. Boone (*pro hac vice*)
25 **ALSTON & BIRD LLP**
26 101 South Tryon Street
27 Charlotte, North Carolina 28280
28 Telephone: (704) 444-1000
Facsimile: (704) 444-1111
brian.boone@alston.com

William H. Jordan (*pro hac vice*)
Caroline M. Rawls (*pro hac vice*)
ALSTON & BIRD LLP
1201 West Peachtree Street
Atlanta, Georgia 30309
Telephone: (404) 881-7000
Facsimile: (404) 881-7777
bill.jordan@alston.com
caroline.rawls@alston.com

Attorneys for Defendant
UnitedHealth Group

1 Dan Woods (SBN 78638)
 Jon C. McNutt (SBN 227761)
 2 **MUSICK, PEELER & GARRETT LLP**
 One Wilshire Building
 3 624 South Grand Avenue, Suite 2000
 Los Angeles, California 90017
 4 Telephone: (213) 629-7600
 Facsimile: (213) 624-1376
 5 d.woods@mpglaw.com
 j.mcnutt@mpglaw.com

6 *Attorneys for Defendant Cherry*
 7 *Creek Mortgage Company, Inc.*

8
 9
 10 **UNITED STATES DISTRICT COURT**
 11 **CENTRAL DISTRICT OF CALIFORNIA**

12 JUDITH DOMINGUEZ, and PATRICIA
 13 MARTINEZ,

14 Plaintiffs,

15 v.

16 CHERRY CREEK MORTGAGE
 COMPANY, INC.; and UNITEDHEALTH
 17 GROUP d/b/a UNITED HEALTHCARE
 SERVICES, INCORPORATED

18 Defendants.

Case No.: 2:17-cv-06085-VAP-JEM

Honorable Virginia A. Phillips

**NOTICE OF SETTLEMENT AND
 STIPULATION THAT
 UNITEDHEALTH GROUP WILL
 NOT BE REQUIRED TO RESPOND
 TO THE AMENDED COMPLAINT**

Current response date: Dec. 6, 2017

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE THAT on December 6, 2017, Plaintiffs Judith
3 Dominguez and Patricia Martinez (“Plaintiffs”), Defendant Cherry Creek Mortgage
4 Company, Inc. (“Cherry Creek”) and UnitedHealth Group, Inc. (“UHG”) reached a full
5 and complete global settlement in principle of the above-captioned action. The parties
6 are finalizing the Confidential Settlement Agreement and expect it to be completed and
7 executed on or before December 13, 2017, at which point a stipulation for dismissal
8 with prejudice will be filed.

9 **PLAINTIFFS AND DEFENDANT UNITEDHEALTH GROUP, INC.**
10 **ALSO STIPULATE, AS FOLLOWS:**

11 WHEREAS, on November 8, 2017, Plaintiffs filed an Amended Complaint;

12 WHEREAS, UnitedHealth Group’s deadline to respond to the Amended
13 Complaint is December 6, 2017;

14 WHEREAS, the Parties have reached a full and complete settlement in principle
15 of the above-captioned action;

16 WHEREFORE, it is hereby stipulated and agreed by and between the Parties that
17 UnitedHealth Group will not be required to respond to Plaintiffs’ Amended Complaint.

18
19 DATED: December 7, 2017 Roger A. Cerda
20 **ALSTON & BIRD LLP**

21 */s/ Roger A. Cerda*
22 *Attorneys for Defendant*
23 *UnitedHealth Group*

24 DATED: December 7, 2017 LORI RIFKIN
25 **HADSELL STORMER & RENICK LLP**

26 */s/ Lori Rifkin*
27 *Attorney for Plaintiffs Judith Dominguez*
28 *and Patricia Martinez*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: December 7, 2017

**DAN WOODS
MUSICK, PEELER & GARRETT LLP**

/s/ Dan Woods
*Attorney for Defendant Cherry Creek Mortgage
Company, Inc.*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I certify that on December 7, 2017, I caused a copy of **NOTICE OF SETTLEMENT AND STIPULATION THAT UNITEDHEALTH GROUP SHALL NOT BE REQUIRED TO RESPOND TO THE AMENDED COMPLAINT** to be served upon the following counsel in the manner described below:

Dan Stormer, Esq
HADSELL STORMER & RENICK
LLP
128 N. Fair Oaks Avenue
Pasadena, CA 91103
Telephone: (626) 585-9600
Facsimile: (626) 577-7079
dstormer@hadsellstormer.com

Dan Woods
MUSICK, PEELER & GARRETT
LLP.
One Wilshire Blvd., Suite 2000
Los Angeles, CA 90017
Telephone: (213) 629- 7622
Facsimile: (213) 624-1376
d.woods@mpglaw.com

Lori Rifkin, Esq
HADSENN STORMER & RENICK
LLP
4300 Horton Street, #15
Emeryville, CA 94608
Telephone: (626) 585-9600
Facsimile: (626) 577-7079
lrifkin@hadsellstormer.com

*Attorney for Defendant
Cherry Creek Mortgage Company, Inc.*

**By the Court's CM/ECF
System**

Attorneys for Plaintiffs

**By the Court's CM/ECF
System**

/s/ Roger A. Cerda
Roger A. Cerda
Email: roger.cerda@alston.com
Attorney for UnitedHealth Group