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FILED
 Superior Court of California
 County of Los Angeles
10/21/2021

Sherri R. Carter, Executive Officer / Clerk of Court
 By: _____ A. Lim Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF LOS ANGELES

19 ELMA SANCHEZ, et al.,
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 Plaintiffs,
 21
 v.
 22 CALIFORNIA PUBLIC EMPLOYEES'
 RETIREMENT SYSTEM, et al.,
 23
 Defendants.
 24

Case No. BC517444
 [Judicial Council Coordinated Proceeding No.
 4936]
 [Hon. William F. Highberger]

**STIPULATION REGARDING EXTENSION
 OF DEADLINE TO SUBMIT CLAIMS
 AND/OR OPT OUT OF THE SETTLEMENT**

[Proposed] Order filed concurrently herewith

1 **WHEREAS**, in accordance with the Amended Order Granting Preliminary Approval of Class
2 Action Settlement, dated July 23, 2021, the Court set the following deadlines:

3 4 5 6 Deadline for Notification by Brokers as to whether Replacement LTC Policy is Available	October 22, 2021 (30 days after deadline to return AAF in section f]
7 8 9 10 11 Deadline for Settlement Administrator to Notify Settlement Class Members who wish to enroll in Replacement LTC Policy that the Policy Will or Will Not be Available	October 27, 2021 [5 days after broker notification deadline in section g]
12 13 14 15 16 17 18 19 20 21 22 23 Response Date: Deadline for Settlement Class Members to (i) Submit Requests for Exclusion; (ii) Return their Award Acknowledgment Form; and (iii) Submit any Written Objections to Settlement Deadline for Settlement Class Members who wish to enroll in Replacement LTC to make further election if Replacement LTC Policy is not available	December 13, 2021 [120 days after Notice Date, accounting for a weekend]
24 25 26 27 28 Deadline for the Settlement Administrator to Submit to the Parties a Final Settlement List noting the Outcome of Notice Process and to	January 4, 2022 [20 days after Response Deadline, accounting for a weekend and holiday]

1 2 3 4 5	Identify all Individuals Who have Submitted a Request for Exclusion and All Individuals Who have Not Submitted an Award Acknowledgement Form	
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7 **WHEREAS**, as a result of unexpected delays, the insurance brokers have requested additional
8 time for their investigation and search for a potential replacement LTC policy;

9 **WHEREAS**, Plaintiffs and CalPERS have conferred and believe that continuing the foregoing
10 deadlines would be in the best interest of the Settlement Class and accordingly request that the Court
11 continue the deadlines to the following:

12 13 14	Deadline for Notification by Brokers as to whether Replacement LTC Policy is Available	Friday, December 6, 2021 (45 days from October 22, 2021)
15 16 17 18 19	Deadline for Settlement Administrator to Notify Settlement Class Members who wish to enroll in Replacement LTC Policy that the Policy Will or Will Not be Available	Monday, December 13, 2021 (47 days from October 27, 2021 to account for weekend)
20 21 22 23 24 25 26 27 28	Response Date: Deadline for Settlement Class Members to (i) Submit Requests for Exclusion; (ii) Return their Award Acknowledgment Form; and (iii) Submit any Written Objections to Settlement Deadline for Settlement Class	Thursday, January 28, 2022 (45 days from December 13, 2021)

Members who wish to enroll in Replacement LTC to make further election if Replacement LTC Policy is not available	
Deadline for the Settlement Administrator to Submit to the Parties a Final Settlement List noting the Outcome of Notice Process and to Identify all Individuals Who have Submitted a Request for Exclusion and All Individuals Who have Not Submitted an Award Acknowledgement Form	Friday, February 18, 2022 (45 days from January 4, 2022)

WHEREAS, the Settlement Administrator will give notice to the Category A Settlement Class Members who have elected Option 2, by U.S. Mail and Electronic Mail by October 27, 2021 of the changes in the deadlines and the Settlement Administrator shall post on the website the deadline changes;

NOW THEREFORE, it is hereby stipulated and agreed, subject to the approval of the Court as follows:

Deadline for Notification by Brokers as to whether Replacement LTC Policy is Available	Friday, December 6, 2021 (45 days from October 22, 2021)
Deadline for Settlement Administrator to Notify Settlement Class Members who wish to enroll in Replacement LTC Policy that the Policy Will or Will Not be Available	Monday, December 13, 2021 (47 days from October 27, 2021 to account for weekend)

<p>Response Date: Deadline for Settlement Class Members to (i) Submit Requests for Exclusion; (ii) Return their Award Acknowledgment Form; and (iii) Submit any Written Objections to Settlement</p> <p>Deadline for Settlement Class Members who wish to enroll in Replacement LTC to make further election if Replacement LTC Policy is not available</p>	<p>Thursday, January 28, 2022 (45 days from December 13, 2021)</p>
<p>Deadline for the Settlement Administrator to Submit to the Parties a Final Settlement List noting the Outcome of Notice Process and to Identify all Individuals Who have Submitted a Request for Exclusion and All Individuals Who have Not Submitted an Award Acknowledgement Form</p>	<p>Friday, February 18, 2022 (45 days from January 4, 2022)</p>

The Settlement Administrator shall give notice by U.S. Mail and electronic mail of the changes in deadlines to Category A Settlement Class Members who elected Option 2, and shall also post the deadline changes on the settlement website by no later than October 27, 2021.

1 Dated: October 19, 2021

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6 Attorneys for Plaintiffs and the Class

7 Dated: October 19, 2021

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21 Attorneys for Defendant
22 CALIFORNIA PUBLIC EMPLOYEES'
RETIREMENT SYSTEM

1 Dated: October 19, 2021


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7 Dated: October 19, 2021

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17 SUPERIOR COURT OF THE STATE OF CALIFORNIA

18 FOR THE COUNTY OF LOS ANGELES

19 ELMA SANCHEZ, et al.,

20 Plaintiffs,

21 v.

22 CALIFORNIA PUBLIC EMPLOYEES'
23 RETIREMENT SYSTEM, et al.,

24 Defendants.

Case No. BC517444

[Judicial Council Coordinated Proceeding No.
4936]

[Hon. William F. Highberger]

**~~PROPOSED~~ ORDER RE STIPULATION
REGARDING EXTENSION OF DEADLINE
TO SUBMIT CLAIMS AND/OR OPT OUT OF
THE SETTLEMENT**

1 **[PROPOSED] ORDER**

2 Based upon the stipulation executed by the parties, and good cause appearing, the Court hereby
3 orders as follows:

4 5 6 7 8 9 10 11 12	Deadline for Notification by Brokers as to whether Replacement LTC Policy is Available	Friday, December 6, 2021 (45 days from October 22, 2021)
13 14 15 16 17 18 19 20 21 22 23 24	Deadline for Settlement Administrator to Notify Settlement Class Members who wish to enroll in Replacement LTC Policy that the Policy Will or Will Not be Available	Monday, December 13, 2021 (47 days from October 27, 2021 to account for weekend)
25 26 27 28	Response Date: Deadline for Settlement Class Members to (i) Submit Requests for Exclusion; (ii) Return their Award Acknowledgment Form; and (iii) Submit any Written Objections to Settlement Deadline for Settlement Class Members who wish to enroll in Replacement LTC to make further election if Replacement LTC Policy is not available	Thursday, January 28, 2022 (45 days from December 13, 2021)
	Deadline for the Settlement Administrator to Submit to the Parties a Final Settlement List noting the	Friday, February 18, 2022 (45 days from January 4, 2022)

<p>Outcome of Notice Process and to Identify all Individuals Who have Submitted a Request for Exclusion and All Individuals Who have Not Submitted an Award Acknowledgement Form</p>	
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The Settlement Administrator shall give notice by U.S. Mail and electronic mail of the changes in deadlines to Category A Settlement Class Members who elected Option 2 and shall also post the deadline changes on the settlement website by no later than October 27, 2021.

IT IS SO ORDERED.

Dated: 10/21/2021



W. F. Highberger

Honorable William F. Highberger / Judge
Judge of the Superior Court

1 **PROOF OF SERVICE**

2 I am employed in San Francisco County, State of California, in the office of a member of the bar
3 of this Court, at whose direction the service was made. I am over the age of eighteen years, and not a
4 party to the within action. My business address is 601 So. Figueroa Street, Suite 2050, Los Angeles, CA
5 990017.

6 On October 19, 2021, I served the following documents in the manner described below:

7 **STIPULATION REGARDING EXTENSION OF DEADLINE TO SUBMIT CLAIMS**
8 **AND/OR OPT OUT OF THE SETTLEMENT**

- 9 (BY U.S. MAIL) I am personally and readily familiar with the business practice of Durie
10 Tangri LLP for collection and processing of correspondence for mailing with the United
11 States Postal Service, and I caused such envelope(s) with postage thereon fully prepaid to
12 be placed in the United States Postal Service at San Francisco, California.
- 13 (BY MESSENGER SERVICE) by consigning the document(s) to an authorized courier
14 and/or process server for hand delivery on this date.
- 15 (BY FACSIMILE) I am personally and readily familiar with the business practice of
16 Durie Tangri LLP for collection and processing of document(s) to be transmitted by
17 facsimile and I caused such document(s) on this date to be transmitted by facsimile to the
18 offices of addressee(s) at the numbers listed below.
- 19 (BY OVERNIGHT MAIL) I am personally and readily familiar with the business
20 practice of Durie Tangri LLP for collection and processing of correspondence for overnight
21 delivery, and I caused such document(s) described herein to be deposited for delivery to a
22 facility regularly maintained by Federal Express for overnight delivery.
- 23 BY CASE ANYWHERE: By electronic transmission via Court ordered electronic service
24 provider, Case Anywhere, the document(s) listed above to the person(s) at the e-mail
25 address(es) set forth below.

26 On the following part(ies) in this action:

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*Attorneys for Defendant California Public
Employees Retirement System*

20 I declare under penalty of perjury under the laws of the United States of America that the
21 foregoing is true and correct. Executed on October 19, 2021, at Los Angeles, California.

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23 Karina Torres
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