

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EMMA GOIDEL, ILANA LEE, MADELEINE
LEE, and LESLEY BROWN, on behalf of
themselves and all others similarly situated,

Plaintiff,

-against-

AETNA, INC.

Defendant.

Case No. 1:21-cv-07619 (VSB)

**STIPULATION AND ORDER TO SUBSTITUTE DEFENDANT
AND CHANGE CASE CAPTION**

The following stipulation is entered into by and between Plaintiffs Emma Goidel, Ilana Lee, Madeleine Lee, and Lesley Brown (collectively, “Plaintiffs”), current Defendant Aetna, Inc. and substitute Defendant Aetna Life Insurance Company (“ALIC”).

Aetna Inc. represents that it is a holding company that owns ALIC in its entirety. Aetna Inc. has no insurance operations or products, no involvement with the daily insurance operations of ALIC or with the provision or administration of Aetna health insurance plans. ALIC represents that it is the entity that provided and/or administered the relevant Aetna plans at issue in this case. ALIC further represents that it is the entity responsible for the development and content of Aetna Clinical Policy Bulletin 0327 under all circumstances.

IT IS HEREBY STIPULATED AND AGREED, pursuant to Federal Rule of Civil Procedure 15, by and between Plaintiffs, Aetna Inc. and ALIC that (1) the Amended Complaint in this action shall be deemed amended to change the name of the defendant to Aetna Life Insurance Company; (2) the Answer in this action shall be deemed to be the answer on behalf of Aetna Life Insurance Company; (3) all discovery requests, responses and objections referring to

“Aetna” or “Aetna Inc.” should be construed to mean Aetna Life Insurance Company; and (4) the caption in this matter shall be changed to remove Aetna Inc. as a defendant and to substitute Aetna Life Insurance Company.

The foregoing stipulation is entered into this 15th day of April, 2022.

EMERY CELLI BRINKERHOFF
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/s/ Zoe Salzman

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*Attorneys for Defendants Aetna Inc. and
Aetna Life Insurance Co.*

ORDER

IT IS SO ORDERED by the Court, this ____ day of April, 2022.

Hon. Vernon S. Broderick
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of April 2022, a copy of the foregoing Stipulation and Proposed Order to Substitute Defendant was electronically filed with the clerk of court of the United States District Court for the Southern District of New York, and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Earl B. Austin
Earl B. Austin