

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MICHAEL LEHIANI, Individually, and on Behalf of All Others Similarly Situated,
Plaintiff,
v.
CENTENE CORPORATION, SARAH M. LONDON, and ANDREW LYNN ASHER,
Defendants.

Case No. 1:25-cv-05659
STIPULATION AND ORDER

WHEREAS, on July 9, 2025, this putative securities class action was filed (ECF 1);

WHEREAS, on July 23, 2025, this Court entered an Order (ECF 15) (the “July 2025 Order”) granting the letter-motion of Centene Corporation, Sarah M. London, and Andrew Lynn Asher (collectively, “Defendants”) for “an adjournment of any deadline to answer or otherwise respond to the Complaint until after the Court appoints a lead plaintiff and lead counsel”;

WHEREAS, on August 11, 2026, this Court appointed Michael Lehiani (“Lead Plaintiff”) as lead plaintiff and approved Lead Plaintiff’s selection of counsel (ECF 38) (the “August 2026 Order”);

WHEREAS, the August 2026 Order also directed the parties to “submit a joint status report by Thursday, August 25, 2026, regarding Lead Plaintiff’s intent to amend the complaint, Defendants’ anticipated response to the operative Complaint, outlining a proposed briefing schedule, if any”;

WHEREAS, Lead Plaintiff intends to file an amended complaint, and Defendants anticipate moving to dismiss that amended complaint;

WHEREAS, pursuant to the Court's July 2025 and August 2026 Orders, Lead Plaintiff and Defendants have contemporaneously filed with this Stipulation and Proposed Order a joint letter proposing a schedule for filing an amended complaint and briefing a motion to dismiss consistent with the below;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties, subject to the Court's approval, as follows:

1. Lead Plaintiff's amended complaint is due on or before November 3, 2026.
2. Pursuant to Rule 2 of the Court's Individual Practices, Defendants will file a letter requesting a pre-motion conference in connection with their anticipated motion to dismiss the amended complaint on or before January 15, 2027.
3. Pursuant to Rule 2 of the Court's Individual Practices, Lead Plaintiff will file a response to Defendants' pre-motion conference letter on or before January 20, 2027.
4. Defendants' motion to dismiss the amended complaint will be due 5 days from the date of the pre-motion conference or the date of the Court's order declining to hold a pre-motion conference; Lead Plaintiff's opposition will be due 77 days after Defendants' motion to dismiss is filed; and Defendants' reply will be due 40 days after Lead Plaintiff's opposition is filed.

Dated: August 25, 2026

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Lead Counsel for Lead Plaintiff and the Class

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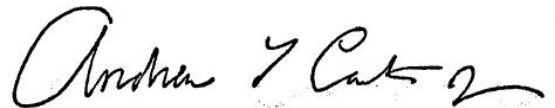
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Counsel for Defendants

IT IS SO ORDERED.

DATED September 1, 2026



THE HONORABLE ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE