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Attorneys for Defendants  
AYA HEALTHCARE, INC., and  
AYA HEALTHCARE SERVICES, INC.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

**Case No: 8:23-CV-00750-MMA-MSB**  
*[Assigned to Hon. Michael Anello]*

JULIANA RECINO, on behalf of  
herself and all others similarly  
situated;

Plaintiff,

v.

AYA HEALTHCARE, INC., a,  
California Corporation; AYA  
HEALTHCARE SERVICES, INC., a  
California Corporation; and DOES 1  
through 50, Inclusive,

Defendants.

**PARTIES' JOINT STATUS  
REPORT RE: DEFENDANT'S  
MOTION TO COMPEL  
ARBITRATION**

TO THE HONORABLE COURT AND MAGISTRATE JUDGE:

Plaintiff JULIANA RECINO, and Defendants AYA HEALTHCARE, INC.  
and AYA HEALTHCARE SERVICES, INC. (Defendants) (collectively “the

1 Parties”), by and through their undersigned counsel, hereby submit this Joint Status  
2 Report pursuant to the Court’s Order dated from August 28, 2023 [Dkt. 7]:

3 WHEREAS, on or around May 8, 2023, Defendants produced certain records  
4 that evidenced that Plaintiff Juliana Recino would have entered into certain Terms  
5 and Conditions in connection with their mutual relationship, and that these Terms and  
6 Conditions included an Arbitration Agreement.

7 WHEREAS, on June 9, 2023, Defendants filed a motion to compel arbitration,  
8 or alternatively, dismiss the action pursuant to Federal Rule of Civil Procedure  
9 12(b)(6) (the “Motion”). *See* Doc. Nos. 3–7.

10 WHEREAS, on or around June 14, 2023, Defendants supplemented their prior  
11 production with records that evidenced the first version of the Terms and Conditions  
12 that Plaintiff Juliana Recino would have entered into in connection with their mutual  
13 relationship. The previous iteration of the agreed-upon Terms and Conditions  
14 included an Arbitration Agreement.

15 WHEREAS, On August 17, 2023, defense counsel provided additional  
16 information to Plaintiff’s Counsel about the fashion in which Plaintiff Juliana Recino  
17 entered into the different iterations of an agreement to arbitrate claims such as those  
18 at issue in this matter. On that same date, Defendants supplemented their previous  
19 productions with an audit trail or electronic log that confirmed that Juliana Recino  
20 electronically signed her consent to be bound by Defendants’ Terms and Conditions,  
21 including the requirement that claims such as those raised by way of her pending  
22 lawsuit be resolved through binding arbitration.

23 WHEREAS On August 18, 2023, the Parties met and conferred regarding the  
24 evidence produced by Defendants, the status of the pending motion to compel  
25 arbitration, and the potential that this matter might be resolved on an individual basis.

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NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties, and by their respective undersigned counsel, and by this Honorable Court that:

- (1) Plaintiff will forego opposition to Defendants’ motion to compel arbitration.
- (2) To the extent Defendants file a motion to dismiss the matter, Plaintiff maintains the right to oppose any such motion, as well as seek any and all other available remedies and forms of relief.
- (3) An Order granting Defendants’ pending motion to compel arbitration [Dkt. 7] be entered.

Dated: September 29, 2023

**DOGRA LAW GROUP PC**

By:   
\_\_\_\_\_  
Shalini Dogra  
Attorneys for Plaintiff and Class

Dated: September 29, 2023

**GORDON & REES, LLP**

By: /s/Kendra Canape  
Kendra S. Canape  
Attorneys for Defendants

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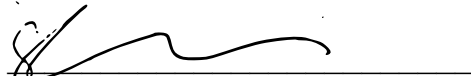
**Signature Certification**

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Kendra S. Canape, counsel for Defendants, and that I have obtained Ms. Canape’s authorization to affix her electronic signature to this document.

Dated: September 29, 2023

**DOGRA LAW GROUP PC**

By:



Shalini Dogra  
Attorneys for Plaintiff