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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

CINDY PADILLA, an Arizona resident,

Plaintiff,

vs.

NORTHWESTERN MUTUAL LIFE
INSURANCE CO., a foreign insurer,

Defendant.

Case No.: CV-08-875-PHX-SRB

**STIPULATION FOR LEAVE TO
FILE RESPONSE AND REPLY TO
THE DEFENDANT’S CROSS
MOTION FOR SUMMARY
JUDGMENT RE: BREACH OF
CONTRACT**

The Parties hereby agree that good cause exists for this Court to enter an order allowing the Plaintiff leave to file a response to the Defendant’s Cross Motion for Summary Judgment and allow the Defendant to file a reply thereto because the Defendant filed the motion before it had leave to file, leaving the briefing of a response in a legal purgatory. The Court has granted the right to file the cross motion as of September 15, 2009. Good cause exists to allow the Plaintiff to file a response to the cross motion for summary judgment because the Plaintiff was waiting for the Court to decide the Defendant’s motion. The Parties request that this Court grant leave on an

1 accelerated basis so that the parties can finalize briefing and stay within this Court's
2 Scheduling Order. The Plaintiff agrees to file her response by October 1, 2009 and the
3 Defendant will file its reply by October 16, 2009.
4

5 Respectfully submitted on September 17, 2009.

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21 **CERTIFICATE OF SERVICE**

22 I hereby certify that on September 17, 2009, I electronically transmitted the
23 attached documents to the Clerk's Office using the CM/ECF System for filing.
24

25 s/Kim M. Hearn
26