ADRIENNE C. PUBLICOVER (SBN 161432) Email: <u>Adrienne.Publicover@WilsonElser.com</u> DENNIS J. RHODES (SBN 168417) Email: <u>Dennis.Rhodes@WilsonElser.com</u> WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP 525 Market Street, 17th Floor San Francisco, California 94105 Tel: (415) 433-0990

Fax: (415) 434-1370

Attorneys for Plaintiff RELIANCE STANDARD LIFE INSURANCE COMPANY

MICHAEL COGAN, ESQ. GENE TUCKER, ESQ. LAW OFFICES OF MICHAEL COGAN 1650 Oregon Street, Suite 106 Redding, CA 96001 Tel: (530) 246-1112 Fax: (530) 243-6079

Attorney for Defendant CHARLIE A. HARRISON

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

)

)

RELIANCE STANDARD LIFE INSURANCE COMPANY,

Plaintiff,

v.

CHARLIE A. HARRISON,

Defendant

Case No.: CV09-00532-GEB (KJN)

FURTHER STIPULATION OF THE PARTIES FOR AN ORDER EXTENDING THE TIME TO FILE DISPOSITIONAL DOCUMENT AND FOR A STATUS CONFERENCE AND [PROPOSED] ORDER THEREON (L.R. 143)

Judge : Hon. Garland E. Burrell, Jr.

The parties, Plaintiff Reliance Standard Life Insurance Company ("Reliance Standard"), and Defendant Charlie Harrison ("Defendant"), by and through their attorneys of record hereby file this stipulation to extend the time for the filing of a dispositional document pursuant to this Court's Order dated September 13, 2011, for good cause as follows.

As stated in the prior stipulation, the parties needed additional time to secure an amendment to the trust in which the real property at interest is held. The trustee has executed an amendment. However, the parties have not yet received the amendment in order to add it to the final settlement agreement. Once the amendment is received, it will be attached to the settlement agreement and the agreement signed. The parties anticipate receipt of the amendment by Monday, November 28, 2011. Therefore, they request that the Court continue the date for the filing of a dispositional document from November 23, 2011 to December 9, and the status conference from December 19, 2011 to January 9, 2012, or to a date that best accommodates this Court's docket so that they may secure the amendment to the trust agreement and sign the release and settlement agreement.

RESPECTFULLY SUBMITTED:

Date: November 23, 2011

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

By: <u>s/ Dennis J. Rhodes</u> ADRIENNE C. PUBLICOVER DENNIS J. RHODES Attorneys for Plaintiff RELIANCE STANDARD LIFE INSURANCE COMPANY

Date: November 23, 2011

LAW OFFICES OF MICHAEL COGAN

By: <u>s/ Michael Cogan</u> MICHAEL COGAN GENE TUCKER Attorneys for Defendant CHARLIE HARRISON

<u>ORDER</u>

Pursuant to the Stipulation of the Parties herein, it is ordered that the date for filing a dispositional document is continued from November 23, 2011 to December 9, 2011. The status conference, currently scheduled for December 12, 2011, is rescheduled for January 30, 2012, at 9:00 a.m. A joint status report shall be filed fourteen days prior to the hearing.

Date: <u>11/28/2011</u>

GARLAND E. BURRELL, JR. United States District Judge