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10 Attorneys for Defendants  
 11 THE HARTFORD aka HARTFORD FIRE  
 INS. CO. And HARTFORD FINANCIAL  
 12 SERVICES GROUP, INC.

13 UNITED STATES DISTRICT COURT  
 14 EASTERN DISTRICT OF CALIFORNIA  
 15 SACRAMENTO DIVISION

18	LINDA K. DESROSIERS,	)	Case No. 2:09-cv-02057-MCE-GGH
		)	
19	Plaintiff,	)	<b>STIPULATION AND JOINT</b>
		)	<b>APPLICATION TO CONTINUE</b>
20	v.	)	<b>DEADLINE FOR HEARING</b>
		)	<b>DISPOSITIVE MOTIONS DUE</b>
21	THE HARTFORD aka HARTFORD	)	<b>TO SCHEDULE CONFLICTS;</b>
	FIRE INS. CO., HARTFORD	)	
22	FINANCIAL SERVICES GROUP,	)	<b>ORDER THEREON</b>
	INC., and DOES 1 through 20,	)	
23	inclusive,	)	Complaint Filed: January 26, 2009
		)	Trial Date: July 29, 2013
24	Defendants.	)	
	_____	)	

25  
 26 Pursuant to Federal Rule of Civil Procedure 16(b)(4), and for good cause shown, Plaintiff  
 27 Linda K. DesRosiers ("Plaintiff") and Defendants The Hartford aka Hartford Fire Ins. Co. and  
 28

1 Hartford Financial Services Group, Inc. (collectively hereinafter "Defendants"), through their  
2 respective counsel of record, hereby stipulate and jointly request that the Court vacate the present  
3 deadline of November 15, 2012 for hearing dispositive motions and continue the deadline for  
4 hearing dispositive motions approximately 28 days. This request will not impact the trial date or  
5 any other deadlines, and will still allow dispositive motions to be heard approximately seven  
6 months before trial.

7 THE PARTIES HEREBY STIPULATE AS FOLLOWS:

8 WHEREAS this matter is set for trial on July 29, 2013.

9 WHEREAS the deadline for the Court to hear dispositive motions is November 15, 2012.

10 WHEREAS counsel for Plaintiff has a number of commitments that will make it impossible  
11 to prepare a response to the extensive summary judgment to be filed in this action including a series  
12 of events that cannot be rescheduled that will require him to be out of town, in addition to mediation  
13 and a recently scheduled appellate oral argument in a complex media defendant defamation case.

14 Consequently, good cause exists for continuing the deadline to hear dispositive motions as  
15 follows: The deadline of November 15, 2012 for hearing dispositive motions shall be continued to  
16 December 13, 2012.

17  
18 IT IS SO STIPULATED.

19 Dated: September 25, 2012

CHRISTOPHER H. WHELAN, INC.

20 By: \_\_\_\_\_/S/\_\_\_\_\_

21 Christopher H. Whelan  
22 Attorneys for Plaintiff  
23 LINDA K. DESROSIERS  
24  
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26  
27

1 Dated: September 25, 2012

JACKSON LEWIS LLP

2  
3  
4 By: /S/ \_\_\_\_\_


5 ROBERT J. SCHNACK  
6 JERRY J. DESCHLER, JR.

7 Attorneys for Defendants  
8 THE HARTFORD aka HARTFORD FIRE  
9 INS.CO and HARTFORD FINANCIAL  
10 SERVICES GROUP, INC.  
11

12 **ORDER**  
13

14 Having reviewed the parties' stipulation, and good cause appearing therefore,  
15 IT IS HEREBY ORDERED that the deadline of November 15, 2012 for hearing dispositive motions  
16 shall be continued to December 13, 2012.  
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18 Dated: October 4, 2012

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20 \_\_\_\_\_  
21 MORRISON C. ENGLAND, JR.  
22 UNITED STATES DISTRICT JUDGE  
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