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RIVERSOURCE LIFE INSURANCE COMPANY

16 UNITED STATES DISTRICT COURT
17 EASTERN DISTRICT OF CALIFORNIA

19 BETTY PLANTE,) CASE NO. 2:10-CV-1121 KJM
20 Plaintiff,)
21 vs.) **STIPULATION RE AND**
22 RIVERSOURCE LIFE INSURANCE) **AMENDED PRETRIAL**
COMPANY f/n/a IDS LIFE INSURANCE) **PREPARATION ORDER**
23 COMPANY,) **(L.R. 240[B] AND 271[D][2])**
24 Defendants.) Complaint Filed: May 18, 2010
25)
26)

STIPULATION

1
2 On September 22, 2010, this Court issued an Order setting certain pre-trial
3 deadlines including a deadline for completion of mediation (February 28, 2011) and a
4 deadline for service of initial written discovery and any request for an independent
5 medical examination of plaintiff (October 15, 2010).

6 The parties, through their respective counsel, have been meeting and conferring
7 regarding strategies related to obtaining additional medical evidence pertaining to
8 plaintiff's condition. The parties are still in the process of conferring as to whether an
9 alternative approach is agreeable and feasible, and have thus agreed to postpone the
10 deadline set forth in this Court's September 22, 2010 Order from October 15, 2010 to
11 October 29, 2010, if the Court will permit. This brief extension stands to preserve the
12 parties' respective resources and to allow them to pursue a potentially more cost and
13 time-effective approach to reaching an informal resolution of this matter.

14 Accordingly,

15 IT IS HEREBY STIPULATED, AGREED AND REQUESTED THAT:

16
17 The Court's September 22, 2010 Order be modified as follows:

18 **The deadline for serving pre-mediation initial written discovery and any**
19 **request for an independent medical examination shall be extended from**
20 **October 15, 2010 to October 29, 2010.**

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Dated: October 14, 2010

KANTOR & KANTOR, LLP

By: /s/
ALAN E. KASSAN
ATTORNEYS FOR PLAINTIFF
BETTY PLANTE

Dated: October 14, 2010

GORDON & REES LLP

By: /s/
LESLIE CRARY
Attorneys For Defendant
RIVERSOURCE LIFE INSURANCE
COMPANY

I, LESLIE K. CRARY, hereby attest that ALAN E. KASSAN, counsel for plaintiff, concurs in the filing of this Statement.

DATED: October 14, 2010

By: /s/
LESLIE K. CRARY

ORDER

IT IS HEREBY ORDERED that the deadline for serving pre-mediation initial written discovery and any request for an independent medical examination shall be extended from October 15, 2010 to October 29, 2010.

DATED: October 18, 2010



U.S. MAGISTRATE JUDGE