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9 Attorneys for Plaintiff,
 10 OTILIA SULLIVAN

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 12 UNITED STATES DISTRICT COURT
 13 EASTERN DISTRICT OF CALIFORNIA
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15 OTILIA SULLIVAN,
 16
 17 Plaintiff,
 18 vs.

Case No.: 2:12-cv-01173-TLN-DAD
 Assigned for All Purposes to the
 Honorable Judge Troy L. Nunley

19 THE PRUDENTIAL INSURANCE
 20 COMPANY OF AMERICA; PHH
 CORPORATION GROUP EMPLOYEE
 21 BENEFIT PLAN, and DOES 1 through 300,
 inclusive,
 22
 23 Defendants.

**STIPULATION AND ORDER RE
 ADDITIONAL TIME FOR
 PLAINTIFF TO FILE MOTION FOR
 ATTORNEYS' FEES AND COSTS TO
 ALLOW TIME FOR THE PARTIES
 TO CONTINUE TO MEET AND
 CONFER**

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 25 Plaintiff Otilia Sullivan ("Plaintiff") and Defendant The Prudential Insurance
 26 Company of America ("Prudential") enter this Stipulation based on the following:
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WHEREAS, on October 22, 2014 the Court entered the Parties’ Proposed Judgment in favor of Plaintiff. (See Doc. No. 68). Plaintiff, as the prevailing party in this litigation, may apply to the Court for an award of attorneys’ fees and recovery of costs of action. Pursuant to the Court’s October 22, 2014 order, any application for an award of attorneys’ fees and recovery of costs of action is due to be filed no later than December 6, 2014. (See Doc. No. 68). Pursuant to this Court’s order, this date was continued to January 20, 2015. (See Doc. No. 70).

WHEREAS, Plaintiff has submitted detailed information to Prudential for its review in support of its motion for an award of attorneys’ fees and costs. Prudential is and has been in the process of reviewing this information and the Parties have been meeting and conferring regarding the issue.

WHEREAS, the Parties have been working together and have diligently met and conferred in good faith in an effort to reach a resolution on attorneys’ fees and costs without court intervention. The Parties represent that due to unavailability of counsel and their clients, especially due to unavailability that was exacerbated during the holiday season, there was further delay with the meet and confer process. Plaintiff has provided detailed information regarding their attorneys’ fees and costs to Prudential which Prudential has reviewed in detail however the Parties are continuing to meet and confer and assert that they will not be in a position to complete their meet and confer efforts and come to a resolution or prepare a motion, if necessary, prior to the January 20, 2015 deadline to file a motion.

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1 Therefore, the Parties, by and through their counsel of record, stipulate and
2 agree that Plaintiff shall have an additional twenty (20) days to file any motion for an
3 award of attorneys' fees and recovery of costs in this action. Plaintiff's motion for
4 attorneys' fees and costs shall be filed no later than February 9, 2015. The Parties do
5 not anticipate needing any additional time beyond this time period.
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7 The foregoing proposed stipulation is respectfully submitted.
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9 IT IS SO STIPULATED.
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11 DATED: January 14, 2015

DONAHUE & HORROW, LLP

12 /s/Nichole Podgurski
13 Nichole Podgurski
14 Attorney for Plaintiff
15 Otilia Sullivan

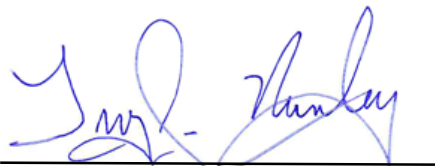
16 DATED: January 14, 2015

MESERVE, MUMPER & HUGHES LLP

17 /s/Cindy Mekari
18 Cindy Mekari
19 Attorneys for Defendants
20 THE PRUDENTIAL INSURANCE
21 COMPANY OF AMERICA and
22 PHH CORPORATION GROUP
23 EMPLOYEE BENEFIT PLAN

24 IT IS SO ORDERED.
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26 Dated: January 14, 2015

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28 Troy L. Nunley
United States District Judge