

1 Royal F. Oakes (SBN 080480)
 roakes@mail.hinshawlaw.com
 2 Michael A.S. Newman (SBN 205299)
 mnewman@mail.hinshawlaw.com
 3 HINSHAW & CULBERTSON LLP
 633 West 5th Street, 47th Floor
 4 Los Angeles, CA 90071-2043
 Telephone: 213-680-2800
 5 Facsimile: 213-614-7399

6 Attorneys for Defendant
 Metropolitan Life Insurance Company
 7

8 **UNITED STATES DISTRICT COURT**
 9 **EASTERN DISTRICT OF CALIFORNIA**

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DANIELA ROBINSON,

Plaintiff,

vs.

METROPOLITAN LIFE INSURANCE
 COMPANY,

Defendants.

Case No. 2:12-cv-01373 JAM AC

**STIPULATION TO CONTINUE
 PRE-TRIAL AND TRIAL DATE**

1 Plaintiff Daniela Robinson and Defendant Metropolitan Life Insurance
2 Company, by and through their respective counsel, hereby stipulate to a brief
3 continuance of certain pre-trial dates and the trial date to accommodate the parties'
4 schedules and to promote efficiency and economy.

5 The parties have been actively attempting to schedule numerous depositions,
6 approximately 20, the majority of which will require travel involving multiple trips
7 to the Midwest and East Coast. To date, calendar conflicts have made it difficult to
8 schedule the depositions. In an effort to resolve these calendar conflicts and to save
9 unnecessary travel and expense, the parties have agreed to attempt to schedule a
10 single deposition of MetLife's "person most knowledgeable" regarding pertinent
11 subjects in the near future, to be followed by a mediation session, tentatively to be
12 held before the Honorable Raul Ramirez (Ret.).

13 To accommodate these agreements between the parties, and to ensure that
14 there is time following the mediation session should it not result in a resolution of
15 this matter, the parties request approximately an extension of approximately thirty
16 days of the following dates and deadlines:

17 Expert Discovery Disclosure Deadline: August 14, 2015 (to September 14,
18 2015)

19 Rebuttal Expert Disclosure Deadline: August 28, 2015 (to September 28,
20 2015)

21 Discovery Cutoff: October 16, 2015 (to November 16, 2015)

22 Deadline for Filing of Motions for Summary Judgment : November 18, 2015
23 (to December 16, 2015)

24 Deadline for Hearing of Motions for Summary Judgment: December 16,
25 2015 (to January 13, 2016)

26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Joint Pretrial Statement Due: January 22, 2016 (to February 12, 2016)

Pre-Trial Conference: January 29, 2016 (to February 19, 2016) at 11:00 a.m.;

Jury Trial: March 7, 2016 (to March 28, 2016) at 9:00 a.m.

DATED: June 22, 2015

DANIEL S. GLASS

By: /s/ Daniel S. Glass
Daniel S. Glass
Attorneys for Plaintiff
Daniela Robinson

DATED: June 22, 2015

HINSHAW & CULBERTSON LLP

By: /s/ Royal F. Oakes
Royal F. Oakes
Michael A.S. Newman
Attorneys for Defendant
Metropolitan Life Insurance Company

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Pursuant to the above stipulation and good cause appearing therefor, the Court orders the pre-trial dates and trial date continued as requested.

IT IS SO ORDERED.

DATED: 6/24/2015

/s/ John A. Mendez

United States District Court Judge