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Email: pelson@relende.ed. 2 3 4 Email: nelson@rolando.sdcoxmail.com Attorney for Defendant Standard Insurance Company 5 6 7 UNITED STATES DISTRICT COURT 8 EASTERN DISTRICT OF CALIFORNIA 9 10 Case No.: 2:13-cv-02164-WBS-CKD KATHLEEN GARCIA. 11 STIPULATION AND [PROPOSED] ORDER RE BRIEFING SCHEDULE Plaintiff, 12 ON STANDARD INSURANCE COMPANY'S PENDING MOTION 13 VS. FOR PARTIAL SUMMARY **JUDGMENT** 14 STANDARD INSURANCE 15 No hearing set or required. COMPANY, et al. Before the Honorable William B. 16 Shubb, Judge 17 Defendants. 18 19 Plaintiff Kathleen Garcia and Defendant Standard Insurance Company 20 ("Standard") conferred upon the date to be selected for the hearing on Standard's 21 Motion for Partial Summary Judgment, filed February 22, 2015 (the "Motion" 22 (PACER Docs 22-23)). Prior to filing the Motion, the last date available for the 23 hearing, as communicated by the Courtroom Deputy, was April 20, 2015. Subject 24 to the Court's approval, Standard and Garcia stipulated and agreed as follows in 25 connection with selecting April 20, 2015, as the hearing date on the Motion, so that 26 (i) Standard and Garcia would have additional time to brief (beyond the dates 27 specified in Local Rule 230(b)-(c)), and, (ii) the Court would have additional time

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1	to consid	ler the Motion prior to the April 20 hearing:
2	1.	The Response of Garcia to the Motion will be due on or before March 25,
3		2015.
4	2.	The Reply of Standard on the Motion will be due on or before April 9,
5		2015. (Standard had originally agreed to file the Reply on or before
6		April 10 but has adjusted its own due date, which in no way impacts the
7		obligations of Garcia, back one day to April 9, to give the Court an extra
8		day to consider the Motion following completion of all filing.)
9	3.	Aside from adjusting the due dates of the Response and Reply briefing
10		(and the due dates of the filing of all papers related to the same) of the
11		Motion, no other deadline is hereby changed.
12	4.	Standard and Garcia respectfully point out that the foregoing schedule
13		will also provide additional time to the Court to consider the Motion.
14	IT IS SO	STIPULATED.
15	Dated: N	March 9, 2015 /s/ Warren H. Nelson, Jr
16		WARREN H. NELSON, JR. A PROFESSIONAL CORPORATION
17 18		6161 El Cajon Boulevard, # 273 San Diego, CA 92115
19		Attorney for Defendant STANDARD INSURANCE COMPANY
20	IT IS SO	STIPULATED.
21	Dated: M	Iarch 9, 2015
23		/s/ Don Doinghum
24		<u>/s/ Dan Rainsbury</u> Dan Rainsbury
25		DAVID ALLEN & ASSOCIATES 5230 Folsom Boulevard
26		Sacramento, CA 95819
27		Attorneys for Plaintiff KATHLEEN GARCIA
28		

## IT IS SO ORDERED.

Dated: March 11, 2015

WILLIAM B. SHUBB

UNITED STATES DISTRICT JUDGE

DOCKET No. 2:13-cv-02164-WBS-CKD

## Kathleen Garcia v. Standard Insurance Company, et al. PROOF OF ELECTRONIC SERVICE VIA CM/ECF

I, Warren H. Nelson, Jr., the undersigned, hereby certify and declare under penalty of perjury that I am over the age of 18 years and am not a party to this action. My business address is Warren H. Nelson, Jr., A Professional Corporation, 6161 El Cajon Blvd., # 273, San Diego, CA 92115, telephone (619) 269-4212, facsimile (619) 501-7948. On the 11<sup>th</sup> day of March 2015, I electronically filed in the above action the following document titled exactly:

STIPULATION AND [PROPOSED] ORDER RE BRIEFING SCHEDULE ON STANDARD INSURANCE COMPANY'S PENDING MOTION FOR PARTIAL SUMMARY JUDGMENT

I have consulted the PACER record for this case. Lead counsel, counsel to be noticed, is there currently specified as Dan Rainsbury, Esq. The foregoing document will therefore automatically be electronically served on Mr. Rainsbury upon submission to the Court on its CM/ECF System.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 11<sup>th</sup> day of March 2015 at San Diego, California.

/s/ Warren H. Nelson, Jr. Warren H. Nelson, Jr.