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9 Standard Insurance Company

10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA

12 KATHLEEN GARCIA,
13 Plaintiff,

14 vs.

15 STANDARD INSURANCE
16 COMPANY, et al.

17 Defendants.

18 Case No.: 2:13-cv-02164-WBS-CKD
19 STIPULATION AND [PROPOSED]
20 ORDER RE BRIEFING SCHEDULE
21 ON STANDARD INSURANCE
22 COMPANY'S PENDING MOTION
23 FOR PARTIAL SUMMARY
24 JUDGMENT

25 No hearing set or required.

26 Before the Honorable William B.
27 Shubb, Judge

28 Plaintiff Kathleen Garcia and Defendant Standard Insurance Company ("Standard") conferred upon the date to be selected for the hearing on Standard's Motion for Partial Summary Judgment, filed February 22, 2015 (the "Motion" (PACER Docs 22-23)). Prior to filing the Motion, the last date available for the hearing, as communicated by the Courtroom Deputy, was April 20, 2015. *Subject to the Court's approval*, Standard and Garcia stipulated and agreed as follows in connection with selecting April 20, 2015, as the hearing date on the Motion, so that (i) Standard and Garcia would have additional time to brief (beyond the dates specified in Local Rule 230(b)-(c)), and, (ii) the Court would have additional time

1 to consider 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: March 9, 2015

16 /s/ Warren H. Nelson, Jr.
17 **WARREN H. NELSON, JR.**
18 **A PROFESSIONAL CORPORATION**
19 **6161 El Cajon Boulevard, # 273**
20 **San Diego, CA 92115**

21 **Attorney for Defendant**
22 **STANDARD INSURANCE COMPANY**

23 **IT IS SO STIPULATED.**

24 Dated: March 9, 2015

25 /s/ Dan Rainsbury
26 **Dan Rainsbury**

27 **DAVID ALLEN & ASSOCIATES**
28 **5230 Folsom Boulevard**
Sacramento, CA 95819

Attorneys for Plaintiff
KATHLEEN GARCIA

1 **IT IS SO ORDERED.**

2 Dated: March 11, 2015

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4 WILLIAM B. SHUBB

5 UNITED STATES DISTRICT JUDGE

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