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11 Attorneys for Defendant
12 LIBERTY LIFE ASSURANCE COMPANY OF BOSTON

13 UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA

15 CHRISTY DICKSON,
16 Plaintiff,
17 v.
18 LIBERTY LIFE ASSURANCE COMPANY
19 OF BOSTON, a corporation, and DOES 1-10,
20 inclusive,
21 Defendants.

Case No. 2:16-cv-00900-KJM-AC

STIPULATION AND [~~PROPOSED~~] ORDER
EXTENDING TIME FOR TO RESPOND TO
WRITTEN DISCOVERY

22 Pursuant to Local Rule 144(a), Plaintiff Christy Dickson (“Plaintiff”) and Defendant
23 Liberty Life Assurance Company of Boston’s (“Liberty”) hereby submit the stipulation set forth
24 herein for the Court’s approval:

25 WHEREAS, Plaintiff’s responses to Liberty’s interrogatories, set one, and request for
26 production of documents, set one, were initially due to be served on or before September 28,
27 2016;

28 WHEREAS, Liberty’s responses to Plaintiff’s interrogatories, set one, and request for
production of documents, set one, were initially due to be served on or before September 30,
2016;

WHEREAS, Plaintiff and Liberty have agreed to participate in private mediation before
mediator Vivien Williamson, which is scheduled for November 9, 2016;

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WHEREAS, Plaintiff and Liberty agree that it would be a more efficient use of time and resources to respond to the propounded written discovery after the parties have engaged in settlement negotiations at the pending mediation set for November 9, 2016;

WHEREAS, Plaintiff and Liberty agree that the responses to the written discovery propounded to each of them shall be due to be served on or before November 23, 2016, should the matter not resolve at the November 9, 2016 mediation;

THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiff Christy Dickson and Defendant Liberty Life Assurance Company of Boston that the date by which Plaintiff's responses to Liberty's interrogatories, set one, and request for production of documents, set one, must be served has been extended, and the responses shall be due to be served on or before November 23, 2016; further, the date by which Liberty's responses to Plaintiff's interrogatories, set one, and request for production of documents, set one, must be served has been extended, and the responses shall be due to be served on or before November 23, 2016;

IT IS SO STIPULATED.

Dated: October 3, 2016

DARRASLAW

By: /s/ Suan B. Grabarsky

Frank N. Darras
Susan B. Grabarsky
Attorneys for Plaintiff
CHRISTY DICKSON

Dated: October 3, 2016

ROPERS, MAJESKI, KOHN & BENTLEY

By: /s/ Stacy M. Tucker

PAMELA E. COGAN
STACY M. TUCKER
BLAKE J. RUSSUM
Attorneys for Defendant
LIBERTY LIFE ASSURANCE
COMPANY OF BOSTON

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[PROPOSED] ORDER

Pursuant to the Parties' Stipulation, IT IS SO ORDERED.

Dated: October 7, 2016



ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE