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6 Attorneys for Defendant
 METROPOLITAN LIFE INSURANCE COMPANY

7
 8 **UNITED STATES DISTRICT COURT**
 9 **EASTERN DISTRICT OF CALIFORNIA**

10 NAOMI RAMIREZ,
 11
 12 Plaintiff,

13 vs.

14 METROPOLITAN LIFE INSURANCE
 COMPANY and FARMERS AGENTS
 15 GROUPS BENEFITS,
 16 Defendants.

Case No. 2:17-cv-01561-KJM-CKD

(Honorable Kimberly J. Mueller)

**STIPULATION BY ALL
 PARTIES TO REQUEST A 90-
 DAY CONTINUANCE OF PRE-
 TRIAL DEADLINES; ORDER**

Hearing Date: Not Set
 Hearing Time: Not Set
 Courtroom: 3

Complaint Filed: July 27, 2017

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 STIPULATION BY ALL PARTIES TO REQUEST A 90-DAY CONTINUANCE OF PRE-TRIAL
 DEADLINES; [PROPOSED] ORDER

Case No. 2:17-cv-01561-KJM-CKD
 302916372v1 1005131

1 It is hereby stipulated by and between attorneys of record for all parties:

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3 1. On April 6, 2018 the Court in the above-entitled matter established the
4 following deadlines: The expert designation deadline is December 7, 2018; the
5 rebuttal expert designation deadline, and the percipient discovery deadline, are both
6 January 7, 2019; and, the last day on which a dispositive motion may be heard is
7 February 22, 2018.

8 2. The parties have diligently conducted discovery, but wish to participate
9 in a mediation session, without the need for completing all remaining discovery,
10 including approximately one dozen depositions, many involving testimony by
11 physicians, which would all need to be completed during the upcoming holidays to
12 comply with existing deadlines.

13 3. The parties also wish to pursue settlement possibilities without the need
14 for filing and responding to dispositive motions. Based on the available line motion
15 hearing dates, such motions would need to be filed by January 4, 2019.

16 4. The parties thus request respectfully request the continuance of the above
17 deadlines by approximately 90 days, or to any dates thereafter convenient with the
18 Court's calendar, to permit the parties to pursue settlement possibilities, and to avoid
19 the necessity of extensive deposition testimony.

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21 DATED: December 4, 2018

Hinshaw & Culbertson LLP

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23 By: /s/ Royal F. Oakes
24 ROYAL F. OAKES
25 MICHAEL A.S. NEWMAN
26 Attorneys for Defendant
27 METROPOLITAN LIFE INSURANCE
28 COMPANY

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DATED: December 4, 2018

Ortiz Law Group, P.C.

By: /s/ Jesse Ortiz
JESSE ORTIZ
NOLAN BERGGREN
Attorneys for Plaintiff
NAOMI RAMIREZ

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ORDER

For good cause appearing therefor, the Court orders the existing pretrial dates and deadlines extended, as follows:

1. Designation of expert witnesses: March 7, 2019.
2. Designation of rebuttal expert witnesses and percipient discovery cut off: April 8, 2019.
3. Last day for hearings on dispositive motions: May 31, 2019.

DATED: December 7, 2018.


UNITED STATES DISTRICT JUDGE