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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 Plaintiff,
 12 vs.
 13 METROPOLITAN LIFE INSURANCE
 14 COMPANY and FARMERS AGENTS
 GROUPS BENEFITS,
 15 Defendants.

Case No. 2:17-cv-01561-KJM-CKD
 (Honorable Kimberly J. Mueller)
STIPULATION BY ALL PARTIES TO REQUEST A 60-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 60-DAY CONTINUANCE OF PRE-TRIAL DEADLINES; ORDER

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 was December 7, 2018; the
5 rebuttal expert designation deadline, and the percipient discovery deadline, were both
6 January 7, 2019; and, the last day on which a dispositive motion may be heard was
7 February 22, 2018.

8 2. On December 7, 2018, following submission of a request by the parties
9 to the Court for a continuance of deadlines in order to pursue settlement prospects,
10 the Court set the expert witness designation deadline as March 7, 2019, the rebuttal
11 expert designation and percipient discovery cutoff as April 8, 2019, and the last day
12 for hearings on dispositive motions as May 31, 2019.

13 3. Although the parties have diligently conducted discovery, they wish to
14 attend a mediation session without engaging in extensive discovery and possible
15 motion practice required by the existing deadlines. A mediation session will take
16 place on March 12, 2019, at the Sacramento, California office of mediator Douglas
17 de Vries.

18 4. The parties thus request respectfully request the continuance of the above
19 deadlines by an additional 60 days, or to any dates thereafter convenient with the
20 Court's calendar, to permit the parties to pursue settlement possibilities, and to avoid
21 the necessity of extensive deposition testimony and possible motion practice.

22
23 DATED: January 31, 2019

HINSHAW & CULBERTSON LLP

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

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DATED: January 31, 2019

ORTIZ LAW GROUP, P.C.

By: /s/ Nolan Berggren _____
JESSE ORTIZ
NOLAN BERGGREN
Attorneys for Plaintiff
NAOMI RAMIREZ

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ORDER

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

1. Designation of expert witnesses: May 7, 2019.
2. Designation of rebuttal expert witnesses and percipient discovery cut off: June 8, 2019.
3. Last day for hearings on dispositive motions: August 9, 2019 at 10:00 a.m. in Courtroom No. 3.

DATED: February 5, 2019.


UNITED STATES DISTRICT JUDGE