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7 Attorneys for Plaintiff,
 CLAIRE M. KRUMPOTICH

8
 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA

11
 12 CLAIRE M. KRUMPOTICH,

13 Plaintiff,

14 VS.

15 PIONEER LIFE INSURANCE
 16 COMPANY OF ILLINOIS,
 WASHINGTON NATIONAL
 17 HEALTH INSURANCE COMPANY
 AND CONSECO SENIOR HEALTH
 18 INSURANCE COMPANY.

19 Defendants.
 20

CASE NO. C 09-00335 JSW

STIPULATION AND ~~PROPOSED~~
 ORDER CONTINUING EXPERT
 DISCLOSURE DATES

Discovery Cut Off Date March 22,
 2010

Trial: June 2, 2010

21 The parties hereby submit the following Stipulation to extend the existing
 22 expert disclosure deadlines for the reasons set forth below:

23 Whereas, the parties previously sought and received a continuance of previous
 24 pre-trial dates so that they could mediate this case, with their mutually desired
 25 mediator, Justice Panelli. As a result of the scheduled mediation, the parties agreed to
 26 postpone further discovery proceedings until after the date of the mediation, which
 27 was held on November 18, 2009;

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Stipulation to Continue Expert Disclosure Dates

1 Whereas, the case did not settle at the mediation and plaintiff desired to take
2 the depositions of certain individuals who were formerly employed by defendant
3 Washington National Insurance Company, and who all reside out of state;

4 Whereas, defendants' counsel was not available to attend the depositions in
5 January, 2010 and as a consequence, the depositions are now scheduled in February,
6 2010,

7 Whereas, the current expert disclosure dates are scheduled for January 22, 2010
8 (plaintiff) and February 12, 2010 (defendant)

9 Whereas, the parties desire their experts to have the benefit of all the discovery
10 prior to the preparation of their reports and the requested extension will not require a
11 further modification of the current pre-trial schedule;

12 Now therefore, it is hereby stipulated and agreed, subject to the Court's
13 approval, that the date for disclosure of plaintiff's experts may be continued from
14 January 22, 2010 to March 1, 2010 and the date for disclosure of defendant's experts
15 may be continued from February 12, 2010 to March 22, 2010. The parties further
16 stipulate and agree that their respective experts and requested documents will be

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Stipulation to Continue Expert Disclosure Dates

1 produced upon request and that subpoenas will not be necessary to compel
2 attendance at deposition or production of documents.

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4 DATED: January 14, 2010

KANTOR & KANTOR, LLP

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6 BY Corinne Chandler
CORINNE CHANDLER
7 ATTORNEY FOR PLAINTIFF
CLAIRE KRUMPOTICH
8

9 DATED: January 14, 2010

LAW OFFICES OF MARC J. WODIN

10
11 BY: Marc J. Wodin
12 MARC J. WODIN
13 ATTORNEYS FOR PIONEER LIFE
INSURANCE COMPANY OF
14 ILLINOIS; WASHINGTON
NATIONAL HEALTH INSURANCE
15 COMPANY AND CONSECO SENIOR
HEALTH INSURANCE COMPANY
16

17 PROPOSED ORDER

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19 The Court having read and considered the parties' Stipulation to continue the
20 Expert Disclosure Dates and good cause appearing therefor, hereby orders that the
21 date for disclosure of plaintiff's experts is continued from January 22, 2010 to March
22 1, 2010 and the date for disclosure of defendant's experts is continued from February
23 12, 2010 to March 22, 2010.

24 Dated: January 14, 2010

25 Jeffrey S. White
26 The Honorable Jeffrey S. White
U.S. District Court Judge
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