

1 WATERS KRAUS & PAUL LLP
 2 INGRID M. EVANS (179094)
 3 ievans@waterskraus.com
 4 711 Van Ness Avenue, Suite 220
 5 San Francisco, CA 94102
 6 Telephone: 415/296-6060 or
 7 800/226-9880
 8 214/777-0470 (fax)

9 BONNETT FAIRBOURN FRIEDMAN
 10 & BALINT, PC
 11 ANDREW S. FRIEDMAN (Pro Hac Vice)
 12 afriedman@bffb.com
 13 KIMBERLY C. PAGE (Pro Hac Pending)
 14 kpage@bffb.com
 15 2901 North Central Avenue, Suite 1000
 16 Phoenix, AZ 85012
 17 Telephone: 602-274-1100

18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**
 20 **NORTHERN DISTRICT OF CALIFORNIA**
 21 **SAN FRANCISCO DIVISION**

22 DAPHNE P. RAND, by and through DEBRA)	Case No. CV 09-0639-SI
23 L. DOLCHE, as Conservator of the Person and)	
24 Estate of DAPHNE P. RAND, Conservatee, on)	STIPULATION AND [PROPOSED]
25 Behalf of Themselves and All Others Similarly)	ORDER CONTINUING ENE
26 Situated,)	COMPLETION DATE
)	
27 Plaintiff,)	(Assigned to the Honorable Susan Illston)
)	
28 v.)	
)	
29 AMERICAN NATIONAL INSURANCE)	
30 COMPANY, a Texas corporation,)	
)	
31 Defendant.)	
)	

32 This stipulation is made between Plaintiff DEBRA J. DOLCH, as Special Administrator
 33 of the Estate of DAPHNE P. RAND (“Plaintiff”) and Defendant American National Insurance
 34 Company (“ANICO” or “Defendant”), by and through their respective counsel of records, based
 35 on the following:

1 WHEREAS, the completion for the Early Neutral Evaluation is currently scheduled for
2 November 30, 2010.

3 WHEREAS, the parties agree that the completion of Early Neutral Evaluation should be
4 extended until after Plaintiff files her motion for class certification on January 21, 2011.

5 THEREFORE, it is hereby stipulated between the undersigned parties, through their
6 counsel of record that, with the Court's permission, the deadline for completion of Early Neutral
7 Evaluation be continued to February 28, 2011.

8
9 DATED: November 16, 2010 WATERS KRAUS & PAUL

10
11 By: _____ /s/

12 Ingrid M. Evans

13 Attorneys for Plaintiff DAPHNE P. RAND, by and
14 through DEBRA J. DOLCH, as Conservator of the
Person and Estate of DAPHNE P. RAND, Conservatee

15 DATED: November 16, 2010 GREER, HERZ & ADAMS, LLP

16
17 By: _____ /s/

18 JOSEPH R. RUSSO

19 Attorneys for Defendant AMERICAN NATIONAL
INSURANCE COMPANY

20 ATTESTATION OF SIGNATURE

21 (N.D. Cal. General Order 45)

22 Pursuant to General Order No. 45, § X(B), I hereby attest under penalty of perjury that
23 concurrence in the filing of the document has been obtained from all the signatories.


24 DATED: November 16, 2010 WATERS KRAUS & PAUL

25
26 By: _____ /s/
Ingrid M. Evans

ORDER

IT IS SO ORDERED.

DATED: _____

By 
The Honorable Susan Illston
District Court Judge

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

1
2 I hereby certify that on November 16, 2010, I electronically filed the foregoing with the
3 Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-
4 mail addresses denoted on the Electronic Mail notice list, and I hereby certify that I have mailed
5 the foregoing document or paper via the United States Postal Service to the non-CM/ECF
6 participants indicated on the Manual Notice list.

7 I certify under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct. Executed on November 16, 2010.

9
10 By: /s/ Rochelle Redmayne
11 Rochelle Redmayne
12 WATERS KRAUS & PAUL LLP
13 711 Van Ness Avenue, Suite 220
14 San Francisco, CA 94102
15 Telephone: 415/296-6060 or
16 800/226-9880
17 214/777-0470 (fax)
18 redmayne@waterskraus.com
19
20
21
22
23
24
25
26
27
28