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19 Attorneys for Plaintiff and the Putative Class

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

23 DAPHNE P. RAND, by and through DEBRA  
 24 J. DOLCH, as Conservator of the Person and  
 25 Estate of DAPHNE P. RAND, Conservatee, on  
 26 Behalf of Themselves and All Others Similarly  
 27 Situated.

28 Plaintiff,

vs.

AMERICAN NATIONAL INSURANCE  
 COMPANY, a Texas corporation.

Defendant.

Case No. CV 09 0639 SI

CLASS ACTION

**STATUS REPORT AND STIPULATION  
AND [~~PROPOSED~~] ORDER TO VACATE  
SCHEDULING ORDER**

Judge Susan Illston

Action Filed: 02/12/09

This Status Report and Stipulation To Vacate Scheduling Orders is submitted jointly by  
 Plaintiff DEBRA J. DOLCH, as Special Administrator of the Estate of DAPHNE P. RAND  
 (“Plaintiff”) and Defendant American National Insurance Company (“ANICO” or “Defendant”),  
 by and through their respective counsel of records. The parties have reached agreement on

1 several material economic terms of a proposed class settlement. The parties have begun the  
2 process of negotiating and preparing a formal settlement agreement. The parties contemplate that  
3 a settlement agreement will be finalized and submitted for preliminary approval by the Court  
4 within the forthcoming 45 days.

5 In light of the parties' progress towards settlement and to avoid burdening the Court with  
6 additional requests to modify the existing pretrial schedule, the parties respectfully request the  
7 Court to vacate the following dates subject to a request for re-instatement by either party or  
8 reinstatement by the Court:

	<b>Current Dates</b>
11 Plaintiff's Motion for Class Certification and 12 Designation of Class Cert Experts	April 21, 2011
13 Defendant's Opposition to Motion for Class 14 Certification and Expert Disclosures	June 11, 2011
15 Plaintiff's Reply in Support of Motion for Class 16 Certification	June 25, 2011
17 [Proposed] Hearing on Motion for Class Certification	July 8, 2011

18 DATED: April 1, 2011

THE EVANS LAW FIRM

20 By: \_\_\_\_\_ /s/

21 INGRID M. EVANS

22 Attorneys for Plaintiff DEBRA J. DOLCH, as Special  
Administrator of the Estate of DAPHNE P. RAND

23 DATED: April 1, 2011

GREER, HERZ & ADAMS, LLP

25 By: \_\_\_\_\_ /s/

26 JOSEPH R. RUSSO

27 Attorneys for Defendant AMERICAN NATIONAL  
28 INSURANCE COMPANY

1 ATTESTATION OF SIGNATURE

2 Pursuant to General Order No. 45, § X(b), I hereby attest under penalty of perjury that  
3 concurrence in the filing of the document has been obtained from all signatories.  
4


5 THE EVANS LAW FIRM

6 DATED: April 1, 2011

7 By:  /s/  
8 INGRID M. EVANS

9  
10 IT IS SO ORDERED.

11  
12 DATED:  4/1/11

13  
14 By   
15 The Honorable Susan Illston  
16 District Court Judge

17 Further Case Management Conference set on 5/20/11 @ 3 p.m. A joint  
18 statement shall be filed one week prior to the conference.  
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