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 12 Swiss Re Life & Health America Inc.

13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA  
 15 SAN FRANCISCO

16 CHRISTA P.C. SULLIVAN,  
 17 Plaintiff,  
 18 v.  
 19 CHASE HOME FINANCE, LLC, et al.,  
 20 Defendants.

No. C09-02876 SI

**STIPULATION AND [PROPOSED] ORDER  
 FOR NEW DEADLINE TO COMPLETE  
 INITIAL DISCLOSURE PURSUANT TO  
 FED. R. CIV. P. 26(a)(1)**

22 Pursuant to the Federal Rules of Civil Procedure, plaintiff CHRISTA P.C.  
 23 SULLIVAN (“Plaintiff”), defendant SWISS RE LIFE & HEALTH AMERICA INC. (“SRLHA”),  
 24 defendants ADVANTA MORTGAGE CORP. and ADVANTA NATIONAL BANK (together,  
 25 “Advanta Entities”), and defendants CHASE HOME FINANCE, LLC successor by merger to  
 26 CHASE MANHATTAN MORTGAGE CORPORATION and CHASE BANK USA f/k/a Chase  
 27 Manhattan Bank USA, N.A. (together “Chase Entities”), by and through their respective attorneys  
 28 of record, agree and stipulate as follows:

1           1.     WHEREAS, pursuant to Fed. R. Civ. P. 26(a)(1)(A), each party to this action  
2 anticipates it will complete its initial disclosure to all of the other parties.

3           2.     WHEREAS, on June 25, 2009, Magistrate Zimmerman ordered the parties to  
4 complete their initial disclosures pursuant to Fed. R. Civ. P. 26 by October 19, 2009.

5           3.     WHEREAS, on July 9, 2009, the deadline for completion of the parties' initial  
6 disclosures pursuant to Fed. R. Civ. P. 26 was continued to October 30, 2009 upon the Order of  
7 the Court.

8           4.     WHEREAS, on October 16, 2009, the parties stipulated pursuant to Civil L.R.  
9 16-9 and ADR L.R. 3-5 to participate in a Private Process ADR in an effort to resolve their  
10 disputes.

11          5.     WHEREAS, on October 22, 2009, the Court ordered this action referred to a  
12 Private Process ADR as stipulated by the parties.

13          6.     WHEREAS, the parties are actively engaged in securing a mediator to conduct  
14 the Private Process ADR and believe that a two-week continuance of the October 30, 2009  
15 deadline to complete their initial disclosures would aid the parties in their efforts to resolve their  
16 disputes.

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7. THEREFORE, the parties agree and stipulate that each party shall complete its initial disclosure pursuant to Fed. R. Civ. P. 26(a)(1)(A) on or before November 13, 2009.

Dated: October 29, 2009

CARROLL, BURDICK & MCDONOUGH LLP

MANNION and LOWE

/s/ Alan P. Jacobus

/s/ Wesley M. Lowe

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Terrance J. Evans  
Attorneys for Advanta Mortgage Corp. USA and Advanta National Bank

PURSUANT TO STIPULATION, IT SO ORDERED.

Dated: \_\_\_\_\_, 2009

Susan Illston  
United States District Court Judge