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 25 RELIANCE STANDARD LIFE INSURANCE COMPANY,
 26 and OLYMPUS AMERICA, INC. LONG TERM DISABILITY PLAN

27 UNITED STATES DISTRICT COURT
 28 NORTHERN DISTRICT OF CALIFORNIA

29 ROSE MIRANDA,)	Case No.: CV09-04452 RS
)	
30 Plaintiff,)	STIPULATION OF THE PARTIES FOR
)	AN ORDER TO CONTINUE THE
31 v.)	HEARING DATE ON DEFENDANTS'
)	MOTION FOR PROTECTIVE ORDER
32 FIRST RELIANCE STANDARD INSURANCE)	
33 LIFE INSURANCE COMPANY, RELIANCE)	
34 STANDARD LIFE INSURANCE COMPANY,)	
35 AND OLYMPUS AMERICA, INC. LONG)	
36 TERM DISABILITY PLAN,)	
)	
37 Defendants,)	
)	

38 **STIPULATION OF THE PARTIES FOR AN ORDER TO CONTINUE THE HEARING DATE ON**
DEFENDANTS' MOTION FOR PROTECTIVE ORDER
 USDC NDCA Case #CV09-04452 RS

1 Defendants FIRST RELIANCE STANDARD LIFE INSURANCE COMPANY,
2 RELIANCE STANDARD LIFE INSURANCE COMPANY, AND OLYMPUS AMERICA,
3 INC. LONG TERM DISABILITY PLAN ("Defendants") and plaintiff Rose Miranda ("Plaintiff")
4 (collectively Defendants and Plaintiff referred to as "the Parties"), by and through their counsel
5 of record hereby submit this stipulation for an order to continue the hearing date on Defendants'
6 Motion for Protective Order to May 4, 2011. Good cause for this continuance exists because:

7 Defendants' Motion for Protective Order is currently set for hearing on April 12, 2011.
8 The issues and authorities relevant to Defendants' Motion for Protective Order substantially
9 overlap with the issues and authorities relevant to Plaintiff's Motion to Compel. To promote the
10 efficient use of the Court's and the Parties' time, the Parties request to have argument on both
11 Defendants' and Plaintiff's discovery motions heard at the same time.

12 Consistent with the Courts reminder to schedule civil matters with Judge Vadas'
13 courtroom deputy, Gloria Masterson, the Parties have been in contact with Ms. Masterson. At
14 the direction of Ms. Masterson, the Parties have conferred and prepared the instant stipulation.
15 The Parties request that a telephonic hearing on both Defendants' and Plaintiff's discovery
16 motions to be held on May 4, 2011, at 1:00 p.m.

17 In connection with the continuance requested herein, and by separate stipulation, the
18 Parties also sought an order from the Honorable Richard Seeborg for another 60 day continuance
19 of the Discovery Cutoff, Motion Cutoff, and Trial Dates, so that both Defendants' and Plaintiff's
20 Motions can be heard, ruled upon, and discovery can be completed, if at all, in accordance with
21 the rulings of this Court.

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1 For the reasons stated herein, the Parties respectfully request that the hearing on
2 Defendants' Motion for Protective Order be continued to May 4, 2011, and that at the same time
3 a hearing on Plaintiff's Motion to Compel take place.

4 **IT IS SO STIPULATED.**

5 Dated: April 8, 2011

KANTOR & KANTOR, LLP

7 By: /s/ Brent Dorian Brehm
8 BRENT DORIAN BREHM
9 Attorneys for Plaintiff
ROSE MIRANDA

10 Dated: April 8, 2011

11 WILSON, ELSER, MOSKOWITZ,
12 EDELMAN & DICKER LLP

13 By: /s/ Dennis J. Rhodes
14 ADRIENNE C. PUBLICOVER
15 DENNIS J. RHODES
16 Attorneys for Defendants
17 FIRST RELIANCE STANDARD LIFE INSURANCE
18 COMPANY, RELIANCE STANDARD LIFE INSURANCE
19 COMPANY, and OLYMPUS AMERICA, INC. LONG
20 TERM DISABILITY PLAN
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MODIFIED ORDER

Pursuant to the stipulation of the Parties and for good cause appearing, the hearing on Defendants' Motion for Protective order is continued to May 4, 2011, at 1:00 p.m., and will be consolidated with the hearing on Plaintiff's Motion to Compel. The hearings will be conducted telephonically. The Court's briefing schedule on Plaintiff's Motion to Compel (Doc. No. 47) remains in place.

IT IS SO ORDERED.

Date: April 11, 2011

By: 

HONORABLE NANDOR J. VADAS
UNITED STATES MAGISTRATE JUDGE