

1 ADRIENNE C. PUBLICOVER (SBN 161432)  
 SHIVANI NANDA (SBN 253891)  
 2 WILSON, ELSER, MOSKOWITZ,  
 EDELMAN & DICKER LLP  
 3 525 Market Street, 17<sup>th</sup> Floor  
 San Francisco, California 94105  
 4 Tel: (415) 433-0990  
 Fax: (415) 434-1370  
 5 Email: [Adrienne.Publiccover@wilsonelser.com](mailto:Adrienne.Publiccover@wilsonelser.com)  
[Shivani.Nanda@wilsonelser.com](mailto:Shivani.Nanda@wilsonelser.com)  
 6

7 Attorneys for Defendant

8 LIFE INSURANCE COMPANY OF NORTH AMERICA

9  
 10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA  
 12

13	DINAH FISCHBACH-BENSON,	)	CASE NO. CV 10-00036 SC
14	Plaintiff,	)	<b>STIPULATION TO EXTEND TIME TO RESPOND TO PLAINTIFF'S INITIAL COMPLAINT, PURSUANT TO LOCAL RULE 6-1</b>
15	v.	)	
16	LIFE INSURANCE COMPANY OF	)	
17	NORTH AMERICA, INSURANCE	)	
18	COMPANY OF NORTH AMERICA, and	)	Action Filed: September 25, 2009
19	DOES 1 through 10,	)	Date of Removal: January 5, 2010
20	Defendants.	)	Current Response Due: March 5, 2010
		)	New Response Date: April 5, 2010

21 Plaintiff Dinah Fischbach-Benson, and defendant Life Insurance Company of North America,  
 22 through their attorneys of record, hereby submit this stipulation to extend the deadline for defendant to  
 23 respond to Plaintiff's complaint by 30 days:

24 WHEREAS, Defendant Life Insurance Company of North America removed this action on  
 25 January 5, 2010.

26 WHEREAS, the parties stipulated that defendant Life Insurance Company of North America's  
 27

1 response to Plaintiff's complaint would be due on Friday, February 5, 2010;

2 WHEREAS, the parties have reached a settlement of all claims and counsel have finalized the  
3 terms of a written settlement agreement and release;

4 WHEREAS, counsel have forwarded the agreed upon settlement agreement and release to their  
5 respective clients for signatures;

6 WHEREAS, given the parties' settlement, the parties stipulated to an additional 30-day  
7 extension of the deadline for defendant Life Insurance Company of North America to respond to the  
8 complaint;

9 ///

10 ///

11 ///

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28

---

2  
**STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT  
PURSUANT TO LOCAL RULE 6-1**

1 NOW THEREFORE, THE PARTIES HEREBY SUBMIT THIS STIPULATED REQUEST  
2 for a Court order extending the deadline for defendant Life Insurance Company of North America to  
3 answer or otherwise respond to Plaintiff's complaint by 30 days.

4  
5 Date: March 8, 2010

WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP

6  
7 By:  / S / Adrienne C. Publicover

8 ADRIENNE C. PUBLICOVER  
9 SHIVANI NANDA  
10 Attorneys for Defendant  
LIFE INSURANCE COMPANY  
OF NORTH AMERICA

11 Date: March 8, 2010

FLYNN, ROSE & PERKINS

12  
13 By:  / S / Charles B. Perkins

14 CHARLES B. PERKINS  
15 SUSAN PELMULDER  
16 Attorneys for Plaintiff  
DINAH FISCHBACH-BENSON

17  
18 **ORDER**

19 Good cause appearing therefore, IT IS HEREBY ORDERED that the deadline for defendant  
20 Life Insurance Company of North America to respond to Plaintiff's complaint will be extended to  
21 April 5, 2010.

22  
23 Date: March 8, 2010

24 By: \_\_\_\_\_  
25 HONORABLE JUDGE SAMUEL CONTI  
26 United States District Court  
27 Northern District of California

