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6 Attorneys for Defendant  
 STANDARD INSURANCE COMPANY

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN FRANCISCO DIVISION

12 HELEN RAINES,  
 13 Plaintiff,  
 14 v.  
 15 STANDARD INSURANCE COMPANY,  
 16 Defendant.

Case No. 3:10-CV-00093-MHP  
**STIPULATION AND [PROPOSED]  
 ORDER TO EXTEND DEADLINES SET  
 FORTH IN THE JOINT CASE  
 MANAGEMENT STATEMENT AND  
 ORDER**  
 Judge: Hon. Marilyn H. Patel

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1           WHEREAS the parties' deadline to disclose identities of all witnesses to be called in each  
2 party's case-in-chief is December 1, 2010;

3           WHEREAS the parties' deadline to disclose identities, resumes, final reports and all other  
4 matters required by Federal Rule of Civil Procedure 26(a)(2) is December 1, 2010;

5           WHEREAS the deadline to hear motions directed to the merits of all or part of the case is  
6 February 17, 2011;

7           WHEREAS the parties are engaged in settlement discussions and believe that further  
8 discussions would be productive and desirable;

9           WHEREAS the parties would like to dedicate their resources towards continuing their  
10 settlement discussions and for that reason would like to minimize their litigation activity during the  
11 period of these discussions;

12           WHEREAS the parties, in furtherance of the objective of minimizing their litigation activity  
13 during the period of their settlement discussions, desire to extend the deadline to disclose identities of  
14 all witnesses to be called in each party's case-in-chief and to disclose identities, resumes, final reports  
15 and all other matters required by Federal Rule of Civil Procedure 26(a)(2) from December 1, 2010 to  
16 December 21, 2010, and to extend the deadline to hear motions directed to the merits of all or part of  
17 the case from February 17, 2011 to March 1, 2011.

18           WHEREAS the parties respectfully request that the Court extend the December 1, 2010  
19 deadlines to December 21, 2010 and the February 17, 2011 deadline to March 1, 2011.

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1 NOW THEREFORE, the parties, by and through their counsel of record, hereby stipulate and  
2 agree, subject to the court's approval, that the deadlines to disclose identities of all witnesses to be  
3 called in each party's case-in-chief and to disclose identities, resumes, final reports and all other  
4 matters required by Federal Rule of Civil Procedure 26(a)(2) shall be December 21, 2010, and the  
5 deadline to hear motions directed to the merits of all or part of the case shall be March 1, 2011.

6 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

7 DATED: November 29, 2010

AKIN GUMP STRAUSS HAUER & FELD LLP

9 By /s/ Maria Ellinikos

MARIA ELLINIKOS

Attorneys for Defendant

STANDARD INSURANCE COMPANY

11 In accordance with General Order No. 45, Rule X, the above signatory attests that concurrence  
12 in the filing of this document has been obtained from the signatory below.

13 DATED: November 29, 2010, 2010

LAW OFFICES OF LAURENCE F. PADWAY

15 By /s/ Laurence F. Padway

LAURENCE FRED PADWAY

Attorneys for Plaintiff

HELEN RAINES

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

20 DATED: November 30, 2010

21  
22 The Honorable  
United States

