

1 **THE COSTA LAW FIRM**  
 DANIEL P. COSTA, State Bar No. 110919  
 2 2489 Sunrise Blvd., Suite A  
 Gold River, California 95670  
 3 Telephone: (916) 400-2734  
 Telecopier: (916) 400-2744

4 Attorneys for Defendant  
 5 **FEDERATED LIFE INSURANCE COMPANY**

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 7  
 8 **IN THE UNITED STATES DISTRICT COURT**  
 9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

11	CHERYL CASON,	)	CASE NO: C 10-00792 EMC
		)	
12	Plaintiff,	)	<b>STIPULATION AND [PROPOSED]</b>
	vs.	)	<b>ORDER TO CONTINUE</b>
13		)	<b>DISCOVERY CUT-OFF DATES</b>
		)	
14	FEDERATED LIFE INSURANCE	)	
	COMPANY; a Minnesota Corporation	)	
15	registered to do business in California; and	)	
	DOES 1 to 100,	)	
16		)	
	Defendants.	)	
17	_____	)	

18  
 19 IT IS HEREBY AGREED AND STIPULATED to by the parties through their respective  
 20 counsel of record that the discovery cut-off dates in this matter be briefly continued. Specifically, the  
 21 parties agreed and stipulated that non-expert discovery in this matter, presently scheduled to close June  
 22 20, 2011, be continued to July 7, 2011, and expert discovery, presently scheduled to close June 20,  
 23 2011, be continued to August 4, 2011. Expert disclosures will now be due July 7, 2011, and rebuttal  
 24 experts shall be disclosed and reports provided by July 21, 2011.

25 This short continuance of the discovery deadline is necessary because lead counsel for  
 26 Defendant FEDERATED LIFE INSURANCE COMPANY (“FEDERATED”), Dan Costa, is in trial

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**STIPULATION AND [PROPOSED] ORDER TO TO CONTINUE DISCOVERY CUT-OFF DATES**

1 in another matter and will have very limited availability through approximately June 17, 2011, or later.  
2 Both parties, having met and conferred regarding new discovery deadlines and having secured  
3 deponents' availability for new dates agreeable to both parties, agree that good cause exists for this  
4 short continuance of applicable discovery deadlines.

5  
6 STIPULATED AND AGREED TO BY:

7 DATED: June 8, 2011

**THE COSTA LAW FIRM**

8  
9 By: /s/ DANIEL P. COSTA  
10 DANIEL P. COSTA, ESQ.  
11 Attorneys for Defendant  
12 FEDERATED INSURANCE COMPANY

13  
14 DATED: June 8, 2011


**DL LAW GROUP**

15 By: /s/ DAVID LILIENSTEIN  
16 DAVID LILIENSTEIN, ESQ.  
17 ALICE WOLFSON, ESQ.  
18 Attorneys for Plaintiff  
19 CHERYL CASON

20 **[PROPOSED] ORDER**

21 **IT IS HEREBY ORDERED** that the discovery cut-off dates in the matter of CASON v.  
22 FEDERATED LIFE INSURANCE COMPANY (CASE NO: C 10-00792 EMC) be continued briefly.  
23 Non-expert discovery is continued from June 20, 2011, to July 7, 2011, and expert discovery is  
24 continued from June 20, 2011, to August 4, 2011. Expert disclosures will now be due July 7, 2011,  
25 and rebuttal experts shall be disclosed and reports provided by July 21, 2011.

26 Dated: June 13, 2011

 JUDGE EDWARD M. CHEN