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13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA

15 DEBRA DUNCANSON,
 16

Plaintiff,
 17

v.
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ROYAL & SUNALLIANCE GROUP LIFE
 19 INSURANCE POLICY,
 20

Defendant,
 21

LIFE INSURANCE COMPANY OF NORTH
 22 AMERICA,
 23

Real Party In Interest.

Case No.: 3:10-cv-02898-JSW

STIPULATION OF THE PARTIES RE
 APPROPRIATE REMEDIES UNDER THE
 COURT'S ORDER OF NOVEMBER 29, 2011
AND ORDER THEREON
 Honorable Jeffrey S. White

Action Filed : June 30, 2010

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 25 On November 29, 2011, the Court issued an order in this matter ("the Order") which, among
 26 other things, requested that the parties to this action submit a stipulation concerning the remedies to
 27 which plaintiff Debra Duncanson ("plaintiff") is entitled as a result of the Order. Pursuant to this
 28 request, plaintiff, defendant Royal & Sunalliance Group Life Insurance Policy, and Real Party in

1 Interest Life Insurance Company of North America (“defendants”)(collectively “the Parties”) hereby
2 stipulate to the following:

3 1. (a) That pursuant to the Order dated November 29, 2011, plaintiff shall be reinstated
4 under the Waiver of Premium coverage with continuing authority by Life Insurance Company
5 of North America to administer and adjudicate her disability status on an ongoing basis; and (b) The
6 individual conversion policy ("conversion policy") issued to Ms. Duncanson is rescinded and the
7 premium paid by Ms. Duncanson under the conversion policy shall be refunded.

8
9 2. The parties still are in the process of trying to resolve the following issues: (a) The
10 amount to be paid to plaintiff's attorney, if any, in attorney's fees and costs; (b) Plaintiff's entitlement
11 to interest on the premium she paid on the conversion policy. The Parties want additional time to try
12 to resolve these issues. If these issues are not resolved, plaintiff will file a motion with the Court
13 addressing these issues by December 29, 2011, defendants will file an opposition three weeks after the
14 date of service of plaintiff's motion, and plaintiff's reply will be filed two weeks after defendants'
15 opposition is served on her. The matter can be set for hearing at a date and time convenient for the
16 Court.

17 IT IS SO STIPULATED.

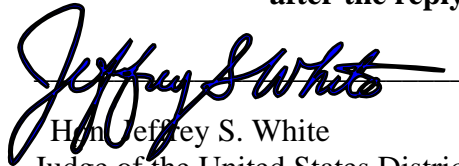
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19 DATED: December 7, 2011 /s/ Laurence F. Padway
20 Laurence F. Padway
21 Law Offices of Laurence F. Padway
22 Attorneys for plaintiff

23 DATED: December 7, 2011 /s/ Sean P. Nalty
24 Sean P. Nalty
25 Wilson, Elser, Moskowitz, Edelman &
26 Dicker, LLP
27 Attorneys for Defendants & Real Party in Interest
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ORDER

PURSUANT TO STIPULATION IT IS SO ORDERED) **If Plaintiff files such a motion, she must
notice the hearing date for at least two weeks
after the reply brief is filed.**

Dated: December 9, 2011



Hon. Jeffrey S. White
Judge of the United States District Court

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