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9 Attorneys for Defendant
 STONEBRIDGE LIFE INSURANCE COMPANY

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA
 13 SAN FRANCISCO DIVISION

15 JESSICA LEE, individually and on behalf of a
 class of similarly situated individuals,

16 Plaintiff,

17 v.

18 STONEBRIDGE LIFE INSURANCE
 19 COMPANY, a Vermont corporation, and
 TRIFECTA MARKETING GROUP LLC, a
 20 Florida limited liability company,

21 Defendants.

Case No. CV 11-0043-RS

**STIPULATION AND
~~PROPOSED~~ ORDER STAYING
 DISCOVERY AND
 IMPLEMENTATION OF NOTICE
 PLAN FOR FOUR WEEKS**

Judge: Hon. Richard Seeborg

Action Filed: Jan. 4, 2011
 Trial Date: June 23, 2014

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Defendant Stonebridge Life Insurance Company (“Stonebridge”), Trifecta Marketing Group LLC (“Trifecta” and collectively with Stonebridge, “Defendants”) and Plaintiff Jessica Lee (collectively with Defendants, the “parties”), by and through their respective counsel of record, hereby enter into the following stipulation:

WHEREAS on March 7, 2013 the Court issued a Case Management Scheduling Order (“Scheduling Order”) stating that all non-expert discovery must be completed on or before June 21, 2013;

WHEREAS several sets of discovery requests propounded by plaintiff and Stonebridge remain outstanding;

WHEREAS the parties have been engaged in pursuing other discovery, including discovery against third parties;

WHEREAS, on May 22, 2013, the Court issued an Order regarding Plaintiff’s proposed plan to provide notice to the class of the pendency of this class action;

WHEREAS the parties have agreed to explore private mediation in an attempt to resolve their dispute on mutually acceptable terms;

WHEREAS the parties desire to preserve the status quo vis-à-vis discovery and implementation of the notice plan and prevent the parties and the Court from unnecessarily expending additional resources pending mediation;

THEREFORE, subject to the approval of the Court, the parties agree and stipulate as follows:

1. All discovery in this action, including third-party discovery, taking of depositions, and litigation of discovery disputes, shall be stayed for 28 days.
2. Implementation of the Notice Plan shall also be stayed for 28 days.
3. Any deadlines for responding to any outstanding discovery shall be extended 28 days.

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2 4. Certain deadlines set forth in the Court's March 7, 2013 Order shall be modified as
3 follows:

| | Old Deadline | New Deadline |
|--|---------------------|---------------------|
| 4 Completion of all non-expert discovery. | June 21, 2013 | July 19, 2013 |
| 5 Initial expert disclosures in accordance with 6 Federal Rule of Civil Procedure 26(a)(2). | July 11, 2013 | August 8, 2013 |
| 7 Designation of supplemental and rebuttal experts 8 in accordance with Federal Rule of Civil 9 Procedure 26(a)(2) | August 9, 2013 | September 6, 2013 |
| 10 Completion of all expert discovery pursuant to 11 Federal Rule of Civil Procedure 26(b)(4). | August 30, 2013 | September 27, 2013 |
| Further Case Management Conference | September 19, 2013 | October 17, 2013 |

12 5. All other deadlines set forth in the Court's March 7, 2013 Order, including the trial
13 date, will remain unchanged.

14 6. All rights and objections with regard to any discovery, including any objections
15 based on the Scheduling Order or the June 21, 2013 discovery cut-off, are reserved and shall not
16 be waived by virtue of this stipulation. No party shall be deemed to have waived their right to
17 submit any outstanding discovery disputes to the Magistrate Judge by virtue of this stipulated
18 order.

19 7. No party will unilaterally seek, over the objection of another party, to further
20 extend any discovery deadlines. This provision does not impact the parties' rights to request the
21 Magistrate Judge to compel additional discovery after the discovery cut-off in connection with a
22 timely-filed motion regarding discovery served prior to the discovery cut-off.

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24 IT IS SO STIPULATED.
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Dated: May 28, 2013

MORRISON & FOERSTER LLP

By: /s/ Tiffany Cheung
TIFFANY CHEUNG

Attorneys for Defendant
STONEBRIDGE LIFE INSURANCE
COMPANY

Dated: May 28, 2013

LAW OFFICES OF ALEXANDER E.
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ALEXANDER SKLAVOS

Attorneys for Defendant
TRIFECTA MARKETING GROUP
LLC

Dated: May 28, 2013

EDELSON LLC

By: /s/ Ryan Andrews
RYAN ANDREWS

Attorneys for Plaintiff
JESSICA LEE and the class

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ATTESTATION OF FILER

I, Tiffany Cheung, hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories. *See* L.R. 5-1(i)(3).

Dated: May 28, 2013

By: /s/ Tiffany Cheung
TIFFANY CHEUNG
MORRISON & FOERSTER LLP

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: 5/28/13



Hon. Richard Seeborg
United States District Judge