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10		
11	UNITED STATES DISTRICT COURT	
12	NORTHERN DISTRICT OF CALIFORNIA	
13	SAN FRANCISCO DIVISION	
14		
15	JESSICA LEE, individually and on behalf of a class of similarly situated individuals,	Case No. CV 11-0043-RS
16		STIPULATION AND
17	Plaintiff,	[PROPOSED] ORDER REGARDING EXTENSION OF
18	V.	EXPERT DISCOVERY DEADLINE
19	STONEBRIDGE LIFE INSURANCE COMPANY, a Vermont corporation, and	Judge: Hon. Richard Seeborg
20	TRIFECTA MARKETING GROUP LLC, a Florida limited liability company,	Action Filed: Jan. 4, 2011
21	Defendants.	Trial Date: June 23, 2014
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	STIPULATION AND [P <del>ROPOSED] O</del> RDER RE EXTENSION OF EXPE CV 11-0043-RS sf-3335565	EKI DISCOVERY DEADLINE

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2	Defendant Stonebridge Life Insurance Company ("Stonebridge") and Plaintiff Jessica Lee		
3	(collectively with Stonebridge, the "Parties," each a "Party"), by and through their respective		
4	counsel of record, hereby enter into the following stipulation:		
5	WHEREAS, on May 28, 2013, the Court entered an order setting the deadline for		
6	completion of all expert discovery for September 27, 2013. (ECF No. 112.)		
7	WHEREAS, on August 8, 2013, the Parties exchanged Rule 26(a)(2) expert reports;		
8	WHEREAS, on September 6, 2013, the Parties exchanged rebuttal expert reports;		
9	WHEREAS, the Parties have propounded written discovery requests on experts, and the		
10	experts have responded to such requests;		
11	WHEREAS, as a result of scheduling conflicts, the Parties have been unable to schedule		
12	expert depositions for mutually convenient times prior to the current September 27 deadline;		
13	WHEREAS, the Parties have agreed to schedule the depositions of two experts on		
14	October 3, 2013, and October 4, 2013;		
15	WHEREAS, the Parties expect to reach agreement on the schedule for the remaining		
16	expert depositions shortly;		
17	WHEREAS, this case is not set for trial until June 23, 2014, and a short extension of the		
18	deadline for completion of expert discovery should not impact other case deadlines;		
19	THEREFORE, subject to the approval of the Court, the Parties agree and stipulate as		
20	follows:		
21	1. The deadline for completion of expert discovery is extended from September 27,		
22	2013 to October 25, 2013.		
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	STIPULATION AND [PROPOSED] ORDER RE EXTENSION OF EXPERT DISCOVERY DEADLINE CV 11-0043-RS		

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2	IT IS SO STIPULATED.		
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4	Dated: September 25, 2013.	MORRISON & FOERSTER LLP	
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6		By: /s/ Tiffany Cheung TIFFANY CHEUNG	
7		Attorneys for Defendant	
8		STONEBRIDGE LIFE INSURANCE COMPANY	
9	Dated: September 25, 2013	EDELSON LLC	
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11		By: /s/ Ryan D. Andrews	
12		RYAN D. ANDREWS Attorneys for Plaintiff	
13		JESSICA LEE and the class	
14	ATTESTATION OF FILER		
15	I, Tiffany Cheung, hereby attest that concurrence in the filing of this document has been		
16	obtained from each of the other signatories. <i>See</i> L.R. 5-1(i)(3).		
17		105. 500 L.N. 5 1(1)(5).	
18	Dated: September 25, 2013	By: /s/ Tiffany Cheung	
19		TIFFANY CHEUNG MORRISON & FOERSTER LLP	
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24	PURSUANT TO STIPULATION, IT IS SO ORDERED		
25		21101 /	
26	Dated: <u>9/26/13</u>	Hon. Richard Seeborg	
27		United States District Judge	
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