

1 DAN MARMALEFSKY (CA SBN 95477)
 dmarmalefsky@mofo.com
 2 MORRISON & FOERSTER LLP
 707 Wilshire Boulevard
 3 Los Angeles, California 90017-3543
 Telephone: 213.892.5200
 4 Facsimile: 213.892.5454

5 TIFFANY CHEUNG (CA SBN 211497)
 TCheung@mofo.com
 6 MORRISON & FOERSTER LLP
 425 Market Street
 7 San Francisco, California 94105-2482
 Telephone: 415.268.7000
 8 Facsimile: 415.268.7522

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 TO
 FURTHER STAY DEADLINES**

Judge: Hon. Richard Seeborg

Action Filed: Jan. 4, 2011

1 Plaintiff Jessica Lee, Defendant Stonebridge Life Insurance Company (“Stonebridge”),
2 and Defendant Trifacta Marketing Group, LLC (“Trifacta”) (collectively the “Parties”), by and
3 through their respective counsel of record, hereby enter into the following stipulation:

4 WHEREAS, the Parties have reached a class action settlement in principle that would
5 resolve all of the claims of Plaintiff and the Class against both Stonebridge and Trifacta;

6 WHEREAS, the Court has approved stipulations between the Parties that stayed all
7 activity in this Action, including all hearings and discovery and motion deadlines, for a total
8 period of approximately 11 weeks to allow the Parties to work on a class action settlement
9 agreement and submit it to the Court for preliminary approval (Docket No. 149);

10 WHEREAS, the Parties agreed to submit a joint status report to the Court upon the
11 expiration of current stay to inform the Court of the status of the settlement;

12 WHEREAS, the Parties have been diligently preparing and exchanging drafts of the class
13 action settlement agreement and related documents, but seek a brief 9-day extension of the
14 current stay, through February 13, 2014, to work on finalizing the agreement;

15 WHEREAS, the Parties believe a further stay of all case deadlines is warranted to avoid
16 unnecessary litigation expenses and to conserve the resources of both the Parties and the Court;

17 THEREFORE, subject to the approval of the Court, the Parties agree and stipulate that
18 this Action, including all hearings and discovery and motion deadlines, shall remain stayed
19 through February 13, 2014. The Parties agree to submit a joint status report on the day that this
20 stay is scheduled to expire to inform the Court of the status of the settlement, unless Plaintiff has
21 moved for preliminary approval of the class action settlement agreement on or before such time.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IT IS SO STIPULATED.

Dated: February 4, 2014

MORRISON & FOERSTER LLP

By: /s/ Tiffany Cheung
TIFFANY CHEUNG
Attorneys for Defendant
STONEBRIDGE LIFE INSURANCE
COMPANY

Dated: February 4, 2014

EDELSON P.C.

By: /s/ Ryan D. Andrews
RYAN D. ANDREWS
Attorneys for Plaintiff
JESSICA LEE and the class


Dated: February 4, 2014

LAW OFFICES OF ALEXANDER
SKLAVOS

By: /s/ Alexander E. Sklavos
ALEXANDER E. SKLAVOS
Attorney for Defendant
TRIFECTA MARKETING GROUP,
LLC

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: 2/5/14



Hon. Richard Seeborg
United States District Judge