

1 **RIMAC MARTIN, P.C.**
 ANNA M. MARTIN - State Bar No. 154279
 2 MATTHEW HICKEY - State Bar No. 239364
 1051 Divisadero Street
 3 San Francisco, California 94115
 Telephone (415) 561-8440
 4 Facsimile (415) 561-8430
amartin@rimacmartin.com
 5
 Attorneys for Defendant
 6 BOSTON MUTUAL LIFE INSURANCE COMPANY

7 **LAW OFFICES OF P. RANDALL NOAH**
 P. Randall Noah - State Bar No. 136452
 8 21 Orinda Way, Suite C, #316
 Orinda, CA 94563
 9 Telephone (925) 253-5540
 Facsimile (925) 253-5542
 10 pnoah@ix.netcom.com

11 Attorney for Plaintiff
 LISA FACEN

13 **UNITED STATES DISTRICT COURT**
 14 **NORTHERN DISTRICT OF CALIFORNIA**
 15 **(San Jose Division)**

| | | |
|---------------------------------|---|--------------------------------------|
| 16 LISA FACEN, |) | |
| |) | CASE NO. C11-00453 EMC |
| 17 Plaintiff, |) | |
| |) | STIPULATION EXTENDING TIME |
| 18 vs. |) | FOR BOSTON MUTUAL LIFE |
| |) | INSURANCE TO ANSWER OR |
| 19 BOSTON MUTUAL LIFE INSURANCE |) | OTHERWISE RESPOND TO |
| 20 COMPANY, |) | PLAINTIFF'S COMPLAINT ; ORDER |
| |) | |
| 21 Defendant. |) | |
| |) | |
| 22 _____) |) | |

23
 24 IT IS HEREBY STIPULATED that defendant BOSTON MUTUAL LIFE INSURANCE
 25 COMPANY (hereinafter "Boston Mutual") may have an extension to answer or otherwise
 26 respond to plaintiff's complaint, such that Boston Mutual's response is now due on or before
 27 March 8, 2011.
 28

1 Good cause exists for this extension because lead counsel for Boston Mutual is presently
2 involved in numerous matters with impending trial dates, and due to the unusually heavy case
3 load requires this additional time to fully evaluate this matter.

4 Pursuant to local rules, this document is being electronically filed through the Court's
5 ECF System. In this regard, counsel for defendant hereby attests that (1) the content of this
6 document is acceptable to all persons required to sign the document; (2) plaintiff's counsel has
7 concurred with the filing of this document; and (3) a record supporting this concurrence is
8 available for inspection or production if so ordered.

9 **SO STIPULATED.**

11 DATED: February 24, 2011 By: /s/ Anna M. Martin

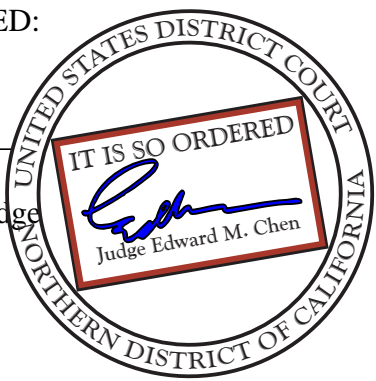
12 ANNA M. MARTIN
13 MATTHEW HICKEY
14 Attorneys for Defendants
15 BOSTON MUTUAL LIFE INSURANCE CO.

16 DATED: February 24, 2011 By: /s/ Randall Noah

17 RANDALL NOAH
18 Attorney for Plaintiff
19 LISA FACEN

20 IT IS SO ORDERED:

21 _____
22 Edward M. Chen
23 U.S. Magistrate Judge



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

PROOF OF SERVICE

LISA FACEN v. BOSTON MUTUAL LIFE INSURANCE COMPANY

USDC Northern District of CA (Oakland Division) Case No.: C11-00453 EMC

I am employed at Rima Martin, P.C., 1051 Divisadero Street, San Francisco, California 94115. I am over the age of 18 years and am not a party to this action.

On this date I served the following:

STIPULATION TO EXTEND TIME FOR BOSTON MUTUAL LIFE INSURANCE TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT

on the interested parties hereto by the following method:

XXX VIA CM/ECF SYSTEM ELECTRONIC SERVICE: I certify that a true and accurate copy of the above-mentioned document was filed with the Clerk of the Court using the CM/ECF Filing System. I am informed and believe that the document(s) will be electronically served on the following attorney(s) of record at the listed email addressed below.

pnoah@ix.netcom.com; Annamartin@rimacmartin.com; arpibalian@rimacmartin.com; kgill@rimacmartin.com; mhickey@rimacmartin.com; smatyszczyk@rimacmartin.com; w_reilly@rimacmartin.com

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed February 25, 2011, at San Francisco, California.

/s/ Kim N. Phan
Kim N. Phan