

SNR DENTON US LLP  
525 MARKET STREET, 26<sup>TH</sup> FLOOR  
SAN FRANCISCO, CALIFORNIA 94105-2708  
(415) 882-5000

1 CHARLES COCHRAN (State Bar No. 98064)  
2 RACHAEL ERICKSON (State Bar No. 217445)  
3 COCHRAN ERICKSON, PC  
4 50 Old Courthouse Square, Suite 601  
5 Santa Rosa, California 95404  
6 Telephone: (707) 544-9006  
7 Facsimile: (707) 544-7213  
8 Email: charlie@hintoncochran.com

9 Attorneys for Plaintiff  
10 BARRY ROSEN

11 CYNTHIA L. MELLEMA (State Bar No. 122798)  
12 JEFFRY BUTLER (State Bar No. 180936)  
13 MEGAN BARKER (State Bar No. 245991)  
14 SNR Denton US LLP  
15 525 Market Street, 26<sup>th</sup> Floor  
16 San Francisco, CA 94105  
17 Telephone: (415) 882-5000  
18 Facsimile: (415) 882-0300  
19 Emails: cynthia.mellema@snrdenton.com  
20 jeffry.butler@snrdenton.com  
21 megan.barker@snrdenton.com

22 Attorneys for Defendant  
23 ENCOMPASS INSURANCE COMPANY

24 UNITED STATES DISTRICT COURT  
25 NORTHERN DISTRICT OF CALIFORNIA  
26 SAN FRANCISCO DIVISION

27 BARRY ROSEN,  
28 Plaintiff,  
29 vs.  
30 ENCOMPASS INDEMNITY COMPANY  
31 and DOES 1 through 50  
32 Defendants.

No. 3:12-cv-03753-EMC  
**STIPULATION TO EXTEND EARLY  
NEUTRAL EVALUATION  
DEADLINE AND CONTINUE CASE  
MANAGEMENT CONFERENCE  
AND [PROPOSED] ORDER**

1 Plaintiff Barry Rosen and defendant Encompass Insurance Company, by and through their  
2 respective counsel of record, hereby stipulate and agree as follows and respectfully request that the  
3 Court approve and give effect to their stipulation:

4 1. The Court has ordered the parties to complete early neutral evaluation by January 7,  
5 2012.

6 2. The Court has set the next case management conference for March 14, 2013.

7 3. Based on the parties' and the early neutral evaluator's schedule and to allow the  
8 parties additional time to adequately evaluate the case in order to conduct a meaningful evaluation  
9 session, the parties request that the Court continue the deadline to complete the early neutral  
10 evaluation until April 8, 2013.

11 4. The parties further request that the Court continue the March 14, 2013 case  
12 management conference to a date convenient to the Court after April 8, 2013.

13 IT IS SO STIPULATED.

14 Pursuant to General Order No. 45, section X(B) regarding signatures, I attest under penalty  
15 of perjury that the concurrence in the filing of this document has been obtained from its signatories.

16  
17 Dated: December 11, 2012

By           /s/ Megan Barker            
MEGAN BARKER

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19  
20 Dated: December 11, 2012

COCHRAN ERICKSON, PC

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22 By           /s/ Charlie Cochran            
23 CHARLIE COCHRAN  
24 Attorneys for Plaintiff  
25 BARRY ROSEN  
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Dated: December 11, 2012

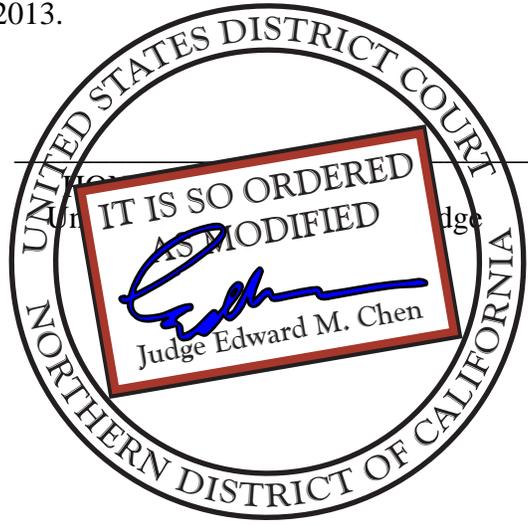
SNR DENTON US LLP

By           /s/ Megan Barker            
MEGAN BARKER  
Attorney for Defendant  
ENCOMPASS INSURANCE COMPANY

**[PROPOSED] ORDER**

IT IS SO ORDERED that the deadline for the parties to complete early neutral evaluation is April 8, 2013. It is further ordered that the case management conference currently set for March 14, 2013 has been continued to           April 18, 2013 at 10:30 a.m.          . An updated joint CMC statement shall           be filed by April 11, 2013.          

Dated:           December 13, 2012          



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