1	Thomas M. Jones, <i>Pro Hac Vice</i> Charles E. Wheeler, CSB No. 82915 COZEN O'CONNOR 501 West Broadway, Suite 1610		
2 3			
4	San Diego, CA 92101 Telephone: 619.234.1700 Facsimile: 619.234.7831		
5	tjones@cozen.com cwheeler@cozen.com		
6	Attorneys for Plaintiff		
7	Illinois Union Insurance Company		
8	UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA		
9	SAN FRANCISCO DIVISION		
10			
11	ILLINOIS UNION INSURANCE COMPANY, an Illinois corporation,	Case No.: 3:13-cv-04863-JST	
12	Plaintiff,	JOINT STIPULATION TO EXTEND TIME TO FILE OPPOSITION AND	
13	v.	REPLY BRIEFS (PLAINTIFF INSURERS' MOTIONS FOR	
14	INTUITIVE SURGICAL, INC., a Delaware	SUMMARY JUDGMENT RE: RESCISSION); and	
15	corporation,	[PROPOSED] ORDER.	
16	Defendant.		
17			
18	AND CONSOLIDATED ACTIONS		
19			
20			
21	Plaintiffs Illinois Union Insurance Company ("Illinois Union") and Navigators Specialty		
22	Insurance Company ("Navigators") (collectively the "Insurers") and Defendant Intuitive Surgical,		
23	Inc. ("Intuitive") jointly stipulate, pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, to extend the		
24	time to file any opposition and reply briefs regarding the Insurers' summary judgment motions on		
25	rescission (the "Motions").		
26	WHEREAS, on March 15, 2016, Illinois Union and Navigators filed and served their Motions		
27	and set the Motions for hearing on May 26, 2016;		
28			
I	l		

1	WHEREAS, as currently scheduled, Intuitive's oppositions to the Insurers' Motions would be		
2	due March 29, 2016 and the Insurers' replies would be due April 5, 2016;		
3	WHEREAS, all parties have agreed to a mutual one-week extension for both Intuitive's		
4	oppositions and the Insurers' replies;		
5	Now therefore, the parties, through their undersigned counsel, hereby stipulate as follows:		
6	That the deadline for filing any opposition(s) to the Insurers' Motions be extended by		
7	one week to April 5, 2016; and		
8	• That the deadline for filing any reply(ies) in support of the Insurers' Motions be		
9	extended by one week to April 19, 2016.		
10			
11	DATED: March 16, 2016		
12	COZEN O'CONNOR		
13	By: <u>/s/ Charles E. Wheeler</u> Attorneys for Plaintiff ILLINOIS UNION INSURANCE COMPANY		
14	INSURANCE COMPANY		
15			
16	HINSHAW & CULBERTSON LLP		
17	By: <u>/s/ John S. Pierce</u> Attorneys for Plaintiff NAVIGATORS SPECIALTY		
18	INSURANCE COMPANY		
19			
20	SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP		
21			
22	By: /s/ James P. Schaefer Attorneys for Defendant INTUITIVE SURGICAL, INC.		
23			
24			
25	Pursuant to Civil Local Rule 5-1(i), the filer attests that concurrence in the filing of this		
26	document has been obtained from the signatories above.		
27	/s/ Charles E. Wheeler		
28			

[PROPOSED] ORDER

PURSUANT TO THE FOREGOING STIPULATION OF THE PARTIES, IT IS

HEREBY ORDERED THAT:

- 1. The deadline for filing any opposition(s) to the Insurers' Motions for summary judgment on rescission be extended by one week to April 5, 2016; and
- 2. The deadline for filing any reply(ies) in support of the Insurers' Motions for summary judgment on rescission be extended by one week to April 19, 2016.

IT IS SO ORDERED.

DATED: March 16, 2016

