	1 2 3 4 5 6 7 8	James P. Keenley (State Bar No. 253106) Brian H. Kim (State Bar No. 215492) BOLT KEENLEY KIM LLP 1010 Grayson Street, Suite Three Berkeley, California 94710 Phone: (510) 225-0696 Fax: (510) 225-1095 Attorneys for Plaintiff KAREN ALBERTS PAMELA E. COGAN (SB 105089) ROBERT M. FORNI, JR. (SB 180841) ROPERS, MAJESKI, KOHN & BENTLEY 1001 Marshall Street, Suite 500 Redwood City, CA 94063-2052		
	10 11	Telephone: (650) 364-8200 Facsimile: (650) 780-1701 Email: rforni@rmkb.com; pcogan@rmkb.com		
ood city	12	Attorneys for Defendant LIBERTY LIFE ASSURANCE COMPANY OF BOSTON		
	13			
	14	UNITED STATES DISTRICT COURT		
	15	NORTHERN DISTRICT OF CALIFORNIA		
	16			
	17	KAREN ALBERTS,	CASE NO. C 14-01587 RS	
	18 19	Plaintiff, v. LIBERTY LIFE ASSURANCE	STIPULATION AND [PROPOSED] ORDER EXTENDING DEFENDANT LIBERTY LIFE ASSURANCE COMPANY OF BOSTON'S TIME TO RESPOND TO FIRST AMENDED COMPLAINT	
	20212223	COMPANY OF BOSTON, Defendant.	Amended Complaint served: June 11, 2014 Current response date: September 5, 2014 New response date: September 12, 2014	
	24			
	25	IT IS HEREBY STIPULATED by and between plaintiff Karen Alberts and defendant		
	26	Liberty Life Assurance Company of Boston ("Liberty Life"), by and through their respective		
	27	attorneys of record, that Liberty Life shall have up to and including September 12, 2014 to file		
	28	and serve its response to plaintiff's First Amended Complaint in this action.		
		RC1/7618752 1/RR2	STIPULATION AND [PROPOSED] ORDER	

	1	Dated: September 5, 2014	BOLT KEENLEY KIM, LLP
	2		
	3		By: /s/ James P. Keenley
	4		JAMES P. KEENLEY BRIAN H. KIM
	5		Attorneys for Plaintiff KAREN ALBERTS
	6	Dated: September 5, 2014	ROPERS, MAJESKI, KOHN & BENTLEY
	7		
	8		By: /s/ Robert M. Forni, Jr.
	10		PAMELA E. COGAN ROBERT M. FORNI, JR.
	11		Attorneys for Defendant LIBERTY LIFE ASSURANCE
	12		COMPANY OF BOSTON
Redwood City	13	<u>OR</u>	<u>DER</u>
Sedwo	14	Pursuant to the parties' stipulation, IT IS	HEREBY ORDERED that defendant Liberty
Ľ	15	Life Assurance Company of Boston shall have up to and including September 12, 2014 to file an serve its response to plaintiff's First Amended Complaint in this action.	
	16		
	17		
	18	Dated: September 8, 2014	21191
	19		Hon. Richard Seeborg
	20		United States District Judge
	21		
	22		
	23		
	24		
	25		
	26		
	27		
	28		
		_	STIPULATION AND [PROPOSED] ORDER