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5 Attorney for Defendants  
 RANDY STEVENS and ELISSA STEVENS  
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 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

10 RANDY STEVENS, ELISSA STEVENS, dba  
 11 FLAMINGO PROPERTIES,  
 12 Plaintiffs,  
 13 v.  
 14 ZURICH AMERICAN INSURANCE  
 15 COMPANY,  
 16 Defendant.  
 17  
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Case No. 3:14-cv-02043 SC

**STIPULATION TO CONTINUE  
 DEADLINES FOR PLAINTIFFS'  
 OPPOSITION TO MOTION FOR  
 SUMMARY JUDGMENT AND  
 DEFENDANT'S REPLY; [PROPOSED]  
 ORDER**

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 20 Plaintiffs RANDY STEVENS, ELISSA STEVENS, dba FLAMINGO PROPERTIES, through  
 21 their counsel Vincent M. Spohn, Esq., hereby request as follows:

- 22 1. **WHEREAS**, the deadline for Plaintiffs RANDY STEVENS, ELISSA STEVENS, dba  
 23 FLAMINGO PROPERTIES to file an Opposition to Defendant's Motion for Summary  
 24 Judgment in this instant action is Thursday, June 11, 2015; and  
 25 2. **WHEREAS**, the deadline for Defendant ZURICH AMERICAN INSURANCE COMPANY to  
 26 file a Reply to Plaintiffs' Opposition to Defendant's Motion for Summary Judgment in this  
 27 instant action is Thursday, June 18, 2015; and  
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3. **WHEREAS**, Plaintiffs' counsel, Vincent M. Spohn, Esq., had a medical emergency occur on June 9, 2015 and is unavailable to file an Opposition by the deadline of Thursday, June 11, 2015; and

4. **WHEREAS**, Plaintiffs' counsel, Vincent M. Spohn, Esq., has been in the hospital since Tuesday, June 9, 2015, and it is not clear when he will be released; and

5. **WHEREAS**, due to Mr. Spohn's medical condition, he has been deprived of the ability to work on Plaintiffs' Opposition to Defendant's Motion for Summary Judgment; and

6. **WHEREAS**, Plaintiffs' counsel request a new Scheduling Order as follows:

**Two (2) days after  
Mr. Spohn is released  
From the hospital and returns  
to work**

Last Day for Plaintiff to File an  
Opposition to Motion for Summary  
Judgment

**Seven (7) days after Plaintiffs file their  
Opposition to Motion for Summary  
Judgment**

Last Day for Defendant to File Reply to  
Motion for Summary Judgment

**July 31, 2015**

Hearing on Defendant's Motion for  
Summary Judgment

7. **WHEREAS**, Defendant's counsel has agreed to stipulate to the aforementioned scheduling order.

**THEREFORE**, Plaintiffs hereby respectfully requests that the Court adopt the aforementioned Scheduling Order.

Dated: June 11, 2015

LAW OFFICES OF VINCENT M. SPOHN, A.P.C.

By *Vanessa O. Bean* for  
VINCENT M. SPOHN, ESQ.  
Attorney for Plaintiffs  
RANDY STEVENS and ELISSA STEVENS

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1 Dated: June 11, 2015

MOUND COTTON WOLLAN & GREENGRASS LLP

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3 By /s/ Jonathan Gross

4 JONATHAN GROSS, ESQ.

5 ELAINE VIDEA, ESQ.

6 Attorneys for Defendant

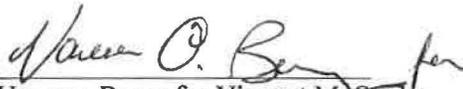
ZURICH AMERICAN INSURANCE COMPANY

7 **CERTIFICATE OF CONCURRENCE**

8 I, Vanessa Beary, for Vincent M Spohn, hereby declare:

9 Pursuant to Local Rule No. 5-1(i)(3) concurrence in the filing of the document has been  
10 obtained from Jonathan Gross to show his signature as /s/ on this pleading in lieu of his physical  
11 signature on the document.

12 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
13 true and correct and that this declaration is executed at San Francisco, California on June 11, 2015.

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16 Vanessa Beary for Vincent M. Spohn

17 **[PROPOSED] ORDER**

18 The Court, having considered the Plaintiffs' request and Defendant's stipulation to Plaintiffs'  
19 request to Continue Deadlines for Plaintiffs' Opposition to Motion for Summary Judgment and  
20 Defendant's Reply, hereby grants Plaintiffs' request and orders the following:

21 The Scheduling Order for Plaintiffs to File their Opposition to Defendant's Motion for  
22 Summary Judgment and for Defendant's Reply to Opposition to Motion for Summary Judgment shall  
23 be as follows:

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25 **Two (2) days after**  
26 **Mr. Spohn is released**  
27 **From the hospital and returns**  
28 **to work**

Last Day for Plaintiff to File an  
Opposition to Motion for Summary  
Judgment

**Seven (7) days after Plaintiffs file their**  
**Opposition to Motion for Summary**

Last Day for Defendant to File Reply to  
Motion for Summary Judgment

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**Judgment**

**July 31, 2015**

Hearing on Defendant's Motion for  
Summary Judgment

**IT IS SO ORDERED.**

Dated: June 17, 2015



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HONORABLE SAMUEL CONTI  
United States District Court Judge