1 2 3 4 5 6 7	J. Russell Stedman (117130), rstedman@bargerwolen.com Peter J. Felsenfeld (260433), pfelsenfeld@bargerwolen.com BARGER & WOLEN LLP 275 Battery Street, Suite 480 San Francisco, California 94111-3309 Telephone: (415) 434-2800 Facsimile: (415) 434-2533 Attorneys for Defendant UNITED OF OMAHA LIFE INSURANCE COMPANY	
8	UNITED STATES DISTRICT COURT	
9	NORTHERN DISTRICT OF CALIFORNIA	
10		
11	RHONDA INSALACO,	CASE NO.: 3:14-CV-02586-EMC
12	Plaintiff,	Hon. Edward M. Chen
13	vs.	STIPULATION FOR MODIFICATION OF COURT'S SEPTEMBER 18, 2014
14	UNITED OF OMAHA LIFE INSURANCE) COMPANY, SWH CORPORATION)	SCHEDULING ORDER; [PROPOSED] ORDER
15	EMPLOYEE WELFARE BENEFIT PLAN,	Complaint Filed: June 24, 2014
16	Defendants.)	
17 18	The particle to this action, through their respective councel, stipulate as follows:	
19	 The parties to this action, through their respective counsel, stipulate as follows: 1. WHEREAS the Court held a Case Management Conference on September 18, 2014 	
20	and has ordered a further Case Management Conference for November 4, 2014;	
21	 WHEREAS the Court also set a briefing schedule and ordered a hearing on 	
22	Defendant United of Omaha Life Insurance Company's ("United") motion for summary judgment	
23	based on the contractual limitations period for November 4, 2014;	
24	3. WHEREAS United has decided not to file this motion for summary judgment;	
25	4. WHEREAS the briefing schedule	for the motion for summary judgment set by the
26	Court is no longer necessary;	
27		
28		
BARGER & WOLEN LLP 275 BATTERY STREET SUITE 480 SAN FRANCISCO, CA 94111 (415) 434-2800	STIPULATION OF PARTIES FOR MODIFICATION OF SCHEDULING ORDER; [PROPOSED] ORDER CASE NO.: 3:14-CV-02586-EMC	

1	5. WHEREAS the parties want to keep the November 4, 2014 Case Management	
2	Conference on calendar rather than advance it to meet and confer and try to reach a stipulation on	
3	the applicable standard of review.	
4	STIPULATION	
5	IT IS THEREFORE AGREED AND STIPULATED by the parties, through their respective	
6	counsel of record, to request that the Court modify its September 18, 2014 Scheduling Order to	
7	eliminate the briefing schedule and hearing on United's motion for summary judgment based on the	
8	contractual limitations period and maintain the November 4, 2014 Case Management Conference on	
9	calendar.	
10		
11	Dated: September 26, 2014 BARGER & WOLEN LLP	
12		
13	By: <u>/s/ J. Russell Stedman</u> J. RUSSELL STEDMAN	
14	PETER J. FELSENFELD Attorneys for Defendant	
15	UNITED OF OMAHA LIFE INSURANCE COMPANY	
16		
17	Dated: September 26, 2014 THE GREY LAW FIRM, P.C.	
18		
19	By: <u>/s/ Rebecca Grey</u>	
20	REBECCA GREY LAUREN CURTIES	
21	Attorneys for Plaintiff Rhonda Insalaco	
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