

*Ropers Majeski Kohn & Bentley  
A Professional Corporation  
Redwood City*

1 PAMELA E. COGAN (SBN 105089)  
2 STACY M. TUCKER (SBN 218942)  
3 ROPERS, MAJESKI, KOHN & BENTLEY  
4 1001 Marshall Street, Suite 300  
5 Redwood City, CA 94063-2052  
6 Telephone: (650) 364-8200  
7 Facsimile: (650) 780-1701  
8 E-Mail: pamela.cogan@rmkb.com  
9 stacy.tucker@rmkb.com

10 Attorneys for Defendants  
11 LIBERTY LIFE ASSURANCE COMPANY OF BOSTON

12 UNITED STATES DISTRICT COURT FOR  
13 THE NORTHERN DISTRICT OF CALIFORNIA

14 HONG NGOC T. DAO,  
15 Plaintiff,  
16 v.  
17 LIBERTY LIFE ASSURANCE  
18 COMPANY OF BOSTON, a  
19 Massachusetts corporation, and DOES 1 to  
20 50, inclusive,  
21 Defendants

CASE NO. 4:14-cv-04749 SI

**STIPULATED REQUEST TO EXTEND  
DEADLINES IN THIS ACTION OTHER  
THAN THE TRIAL DATE**

22 **WHEREAS**, the parties are interested in exploring settlement options for this litigation;

23 **WHEREAS**, the parties requested referral to a magistrate judge for settlement conference  
24 pursuant to ADR L.R. 7-1, and were assigned to Magistrate Judge Donna Ryu;

25 **WHEREAS**, due to the schedules of the parties and Judge Ryu, the first available  
26 settlement conference date is May 9, 2016;

27 **WHEREAS**, the parties hope to resolve this matter prior to filing summary judgment  
28 motions and therefore seek to move the April 29, 2016 dispositive motion deadline to after the  
settlement conference date;

**WHEREAS**, the parties have recently taken physician depositions relevant to the case and  
have not yet received the transcripts of those depositions, which need to be reviewed by expert  
witnesses in this action;

1           **WHEREAS**, the parties therefore also seek to move out the expert witness deadlines to  
 2 permit the deposition transcripts to be used by the witnesses;

3           **WHEREAS**. Plaintiff’s counsel will be out of the country on the scheduled date of the  
 4 pretrial conference, July 19, 2016 and the parties therefore ask the Court to continue that  
 5 conference;

6           **WHEREAS**, the parties have twice stipulated to move the trial date in this action;  
 7 however this stipulation does not seek to reschedule the August 15, 2016 trial date;

8           **IT IS HEREBY STIPULATED** between the parties, by and through their respective  
 9 counsel of record, that the parties respectfully ask this Court adopt the following schedule:

	Current Date	Requested New Date
Expert Disclosures	March 30, 2016	April 29, 2016
Expert rebuttal reports due	April 15, 2016	May 13, 2016
Expert discovery cutoff	April 29, 2016	May 27, 2016
Dispositive motion filing cutoff	April 29, 2016	May 27, 2016
Pretrial Conference	July 19, 2016	August <sup>2</sup> <del>1</del> , 2016
Trial Date	August 15, 2016	August 15, 2016

20           **IT IS SO STIPULATED.**

21           The filer of this document attests that concurrence in this filing has been obtained from all  
 22 signatories.

23 Dated: March 25, 2016

BEYERS COSTIN SIMON

25 By: /s/ Suzanne K. Babb

26 SUZANNE BABB  
 27 Attorneys for Plaintiff  
 HONG NGOC T. DAO

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: March 25, 2016

ROPERS, MAJESKI, KOHN & BENTLEY

By: /s/ Stacy M. Tucker  
PAMELA E. COGAN  
STACY M. TUCKER  
Attorneys for Defendant,  
LIBERTY LIFE ASSURANCE  
COMPANY OF BOSTON

**IT IS SO ORDERED.**

Dated: March 30, 2016

By:   
HON. SUSAN ILLSTON