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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

14 JOSE DAGUNA,
15 Plaintiff,
16 v.
17 LIBERTY LIFE ASSURANCE
COMPANY OF BOSTON,
18 Defendants.
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Case No. 5:15-cv-00905-EMC

**JOINT STIPULATION AND ~~[PROPOSED]~~
ORDER CONTINUING INITIAL CASE
MANAGEMENT CONFERENCE**

**Complaint served: July 30, 2015
Current response date: September 4, 2015**

Hon. Edward M. Chen

22 WHEREAS, the initial Case Management Conference in the above-entitled action is set
23 for September 3, 2015, at 9:30 a.m.;

24 WHEREAS, Plaintiff Jose Daguna (“Daguna”) served Defendant Liberty Life Assurance
25 of Boston (“Liberty Life”) with the Summons and Complaint on July 30, 2015;

26 WHEREAS, Liberty Life has not appeared in this action, and, pursuant to the parties’
27 Stipulation (Document No. 17), Liberty Life has until September 4, 2015 to file its response to the
28 Complaint; and

1 WHEREAS, counsel for Liberty Life in this action, Robert M. Forni, Jr., will be
2 unavailable for any proceedings in this action September 21, 2015 through October 2, 2015, while
3 he is out of the country on a pre-planned, non-refundable vacation;

4 The parties hereby stipulate and agree, by and through their counsel, to continue the Case
5 Management Conference in this matter from September 3, 2015, to November 10, 2015, at
6 9:30 .am.

7 The parties further stipulate and agree to file a Joint Case Management Conference
8 Statement pursuant to Fed. R. Civ. Pro. 26(f) no later than November 3, 2015.

9 All signatories to this Statement, and all parties on whose behalf the filing is submitted,
10 have authorized its filing.

11 Dated: September 2, 2015

ROPER, MAJESKI, KOHN & BENTLEY

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13 By: /s/ Robert M. Forni, Jr.

PAMELA E. COGAN
ROBERT M. FORNI, JR.
Attorneys for Defendant, LIBERTY LIFE
ASSURANCE COMPANY OF BOSTON

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16 Dated: September 2, 2015

LAW OFFICES OF TONY ARJO

17
18 By: /s/ Tony Arjo

TONY ARJO
Attorneys for Plaintiff, JOSE DAGUNA

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20 **ORDER**

21 Pursuant to the Stipulation, the court hereby finds good cause to continue the Case
22 Management Conference from September 3, 2015, to November ¹⁷~~19~~, 2015 at 9:30 a.m. The parties
23 shall file a Joint Case Management Conference Statement pursuant to Fed. R. Civ. Pro. 26(f) no
24 later than November ¹⁰~~3~~, 2015.

25 **IT IS SO ORDERED:**

26 Dated: September ²____, 2015

