

1 **RIMAC MARTIN, P.C.**
 Anna M. Martin – CSBN 154279
 2 amartin@rimacmartin.com
 3 1051 Divisadero Street
 San Francisco, CA 94115
 4 Telephone: 415.561-8440
 Facsimile: 415.561-8430

5
 6 *Attorneys for Defendant*
 UNUM LIFE INSURANCE COMPANY
 7 OF AMERICA

8 Emily A. Bolt (State Bar No. 253109)
 9 Brian H. Kim (State Bar No. 215492)
 James P. Keenley (State Bar No. 253106)
 10 BOLT KEENLEY KIM LLP
 11 1010 Grayson Street, Suite Three
 Berkeley, California 94710
 12 Phone: (510) 225-0696
 Fax: (510) 225-1095

13
 14 *Attorneys for Plaintiff*
 JOLENE BAILEY

15
 16 **UNITED STATES DISTRICT COURT**
 17 **NORTHERN DISTRICT OF CALIFORNIA**

18	JOLENE BAILEY,)	Case No.: 3:15-cv-03612 HSG
19)	
20	Plaintiff,)	JOINT STIPULATION TO CONTINUE
21	v.)	CASE MANAGEMENT CONFERENCE
22	UNUM LIFE INSURANCE COMPANY OF)	AND RELEATED DEADLINES AND
23	AMERICA,)	PROPOSED ORDER
24	Defendant.)	Judge: Hon. Haywood S. Gilliam, Jr.

25
 26 **JOINT STIPULATION**

27 It is hereby stipulated by and between the parties, through their attorneys of record, that
 28 the Court continue the February 9, 2016 at 2:00 p.m. to February 19, 2016 at 2:00 p.m. and the

1 January 26, 2016 joint letter filing deadline to February 9, 2016 as the parties are scheduled for
2 private mediation on January 27, 2016.

3 By way of background, the Court issued a November 10, 2015 minute order which stated
4 as follows:

5
6 Minute Entry for proceedings held before Hon. Haywood S. Gilliam, Jr.: Case
7 Management Conference held on 11/10/2015. . . . Plaintiff Attorney Brian Kim.
8 Defendant Attorney William Reilly. Matter is continued to February 9, 2016 at
9 2:00 p.m. Parties are directed to meet and confer regarding the standard of review
and scope of discovery and file a joint letter brief (5-10 pages in length) regarding
any unresolved disputes by January 26, 2016.

10
11 The parties are scheduled to complete private mediation with Arnold Levinson on
12 January 27, 2016, the only date that was available for all of the parties.

13 Good cause exists to continue the February 9, 2016 at 2:00 p.m. Case Management
14 Conference and the January 26, 2016 joint letter brief filing deadline as it is possible that the case
15 will resolve at the mediation. If the case resolves at mediation, then there will be no need to
16 prepare the joint letter or appear at a Case Management Conference, allowing the parties to avoid
17 unnecessarily incurring attorney fees and the Court's resources. However, if the case does not
18 resolve at mediation, the proposed continuance will give the parties sufficient time and
19 opportunity to meaningfully meet and confer and prepare a joint letter brief that will sufficiently
20 inform the Court on unresolved disputes regarding the standard of review and the scope of
21 discovery.

22 **IT IS SO STIPULATED.**

23 Dated: January 19, 2016

BOLT KEENLEY KIM LLP

24
25 By: /s/ Emily Bolt

26 Emily Bolt
27 Attorneys for Plaintiff
28

1 Dated: January 19, 2016

RIMAC MARTIN

2
3 By: /s/ Anna Martin

4 Anna Martin

5 Attorneys for Defendant

6
7
8 **ORDER**

9
10 Having reviewed the stipulation of the parties and good cause showing, the Court hereby
11 GRANTS the parties' stipulation, and ORDERS that the the Case Management Conference
12 currently scheduled for February 9, 2016 at 2:00 p.m. be continued to February 23, 2016 at 2:00
13 p.m., ORDERS the January 26, 2016 joint letter filing deadline be continued to February 9,
14 2016.

15
16 **IT IS SO ORDERED.**

17
18 

19 Hon. Haywood S. Gilliam, Jr.
20 United States District Court Judge
21 Northern District of California