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The Prudential Insurance Company of America  
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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

13 GINA MARIE WASHBURN, individually and  
on behalf of all others similarly situated,  
14  
Plaintiff,  
15  
v.  
16 THE PRUDENTIAL INSURANCE  
17 COMPANY OF AMERICA, a New Jersey  
corporation, and DOES 1-10, inclusive,  
18  
Defendants.  
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Case No. 3:15-cv-04009 SI  
Hon. Susan Illston  
CLASS ACTION

**STIPULATION FOR RELIEF FROM  
ORDER SETTING CASE  
MANAGEMENT CONFERENCE AND  
ADR DEADLINES (Fed. R. Civ. P.  
16(b)(4); L.R. 16-2(e))**

Pursuant to Fed. R. Civ. P. 16(b)(4), Local Rule 16-2(e), and by order of this Court, Plaintiff Gina Marie Washburn (“Plaintiff”) and Defendant The Prudential Insurance Company of America (“Defendant”) (collectively, the “Parties”) hereby respectfully stipulate and jointly request that the Court modify the Order Setting Initial Case Management Conference and ADR Deadlines, dated September 3, 2015 (Dkt. 8).

### **RECITALS**

1. This action was removed to this Court on September 2, 2015. Dkt. 1. On September 3, 2015, the Court issued an Order Setting Initial Case Management Conference and ADR Deadlines, setting the initial Case Management Conference for December 4, 2015, and setting related deadlines based on that date. Dkt. 8.

2. On November 20, 2015, the Court held a hearing on Defendant’s Motion to Dismiss and took the motion under submission. Dkt. 27. The parties met and conferred and agree that the case management schedule set forth in the Court’s September 3, 2015 Order should be vacated and replaced with the schedule set forth below.

|                   |   |  |
|-------------------|---|--|
| December 11, 2015 | Defendant to produce initial document production regarding documents related to Plaintiff.  |  |
| January 15, 2016  | Last day to:<br><br>File ADR Certification signed by Parties and Counsel (form available at <a href="http://www.cand.uscourts.gov">http://www.cand.uscourts.gov</a> ); and<br><br>File either Stipulation to ADR Process or Notice of Need for ADR Phone Conference | Civil L.R. 16-8(b) & (c)<br><br>ADR L.R. 3-5(b)  |
| January 15, 2016  | Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per Standing Order re Contents of Joint Case Management Statement   | Fed. R. Civ. P. 26(a)(1);<br><br>Civil L.R. 16-9 |

|                            |                  |   |                  |
|----------------------------|------------------|---|------------------|
| 1<br>2<br>3<br>4<br>5<br>6 | January 22, 2016 | Initial Case Management Conference to<br>be held at 2:00 PM in:<br><br>Courtroom G , 15th Floor<br><br>Phillip Burton Federal Building<br><br>450 Golden Gate Avenue<br><br>San Francisco, CA 94102 | Civil L.R. 16-10 |
|----------------------------|------------------|---|------------------|

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9 Dated: November 24, 2015

BRAMSON, PLUTZIK, MAHLER &  
BIRKHAUSER, LLP

10  
11 By: /s/ Robert M. Bramson

12 Robert M. Bramson  
13 Attorneys for Plaintiff

14 Dated: November 24, 2015


DENTONS US LLP

15  
16 By: /s/ Andrew S. Azarmi

17 Laura Leigh Geist  
18 Andrew S. Azarmi  
19 Attorneys for Defendants  
20 THE PRUDENTIAL  
INSURANCE COMPANY OF AMERICA

21 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

22  
23 Dated: 11/24, 2015

24   
Honorable Susan Illston  
United States District Judge

25 USW 805340767.1