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7 Attorneys for Defendant  
 Metropolitan Life Insurance Company  
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9 **UNITED STATES DISTRICT COURT**  
 10 **NORTHERN DISTRICT OF CALIFORNIA**

11  
 12 JOHN KRESICH,  
 13 Plaintiff,  
 14 vs.  
 15 METROPOLITAN LIFE INSURANCE  
 COMPANY, Does 1-50,  
 16 Defendants.  
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 19  
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Case No.: 15-cv-05801-MEJ

**STIPULATION TO CONTINUE  
 DISCOVERY CUT-OFF AND  
 MOTION FILING CUT-OFF BY  
 TWO MONTHS; ~~[PROPOSED]~~  
 ORDER**

Complaint Filed: July 13, 2015  
 Trial Date: None

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 STIPULATION TO CONTINUE DISCOVERY CUT-OFF AND MOTION FILING CUT-OFF  
 BY TWO MONTHS

1 **TO THE COURT AND THE COURT CLERK:**

2 Plaintiff John Kresich ("Plaintiff") and Defendant Metropolitan Life  
3 Insurance Company ("MetLife") hereby stipulate, through their counsel of record,  
4 to request the Court to extend by two months the current discovery cutoff date of  
5 November 1, 2016, and the current deadline for filing motions of December 1,  
6 2016. The requested extensions will have no impact on the trial date.

7 The parties respectfully request that the discovery cut-off be continued  
8 through and including December 31, 2016, and request that the motion filing  
9 deadline be continued through and including February 1, 2017.

10 Good cause exist for the extension of the discovery deadline, scheduling  
11 conflicts beyond the control of the parties and their counsel have prevented  
12 completion of discovery, including the taking of numerous depositions. Good  
13 cause exists for the extension of the motion filing deadline, as the fact necessary  
14 discovery has not been completed has prevented the parties from fully evaluating  
15 the need for, and the preparation of possibly dispositive motions.

16  
17 DATED: November 8, 2016 RAY BOURHIS ASSOCIATES

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19 By: /s/Eric Whitehead  
Ray Bourhis  
Eric Whitehead  
20 Attorneys for Plaintiff John Kresich

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22 DATED: November 8, 2016 HINSHAW & CULBERTSON LLP

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24 By: /s/ Royal F. Oakes  
Royal F. Oakes  
Michael A.S. Newman  
25 James C. Castle  
26 Attorneys for Defendant Metropolitan  
Life Insurance Company

1 ~~[PROPOSED]~~ ORDER

2 Having reviewed the parties' stipulation and good cause appearing, the Court  
3 the following schedule. See below.  
4 hereby orders ~~that the discovery cut off is extended to December 31, 2016 and the~~  
5 ~~motion filing deadline is extended to February 1, 2017.~~

6 **IT IS SO ORDERED.**

7 DATED: November 9, 2016

8 U.S. DISTRICT  
9 MAGISTR



10 Jury Trial (5 days): 8/7/2017 @ 9:30 a.m.  
11 Pretrial Conference: 6/29/2017 @ 10:00 a.m.  
12 Final Pretrial Conference: 7/27/2017 @ 10:00 a.m.  
13 Disclosure of Experts Witnesses: 12/20/2016  
14 Disclosure of Rebuttal Expert Witnessed: 12/30/2016  
15 Discovery Cut-off: 1/17/2017  
16 Deadline to file Dispositive Motions: 2/16/2017  
17 Hearing on Dispositive Motions: 3/23/2017  
18 Exchange of Pretrial Disclosures: 5/24/2017  
19 Deadline to File Pretrial Conference Statements  
20 and related disclosures; Motions in Limine; and Trial  
21 Briefs and related disclosures: 6/8/2017  
22 Deadline to file Motions in Limine Oppositions: 6/15/2017