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11 Attorneys for Defendant Hartford Life and Accident
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12
 13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

16 HADAR MEIRI, an individual,
 17 Plaintiff,
 18 v.
 19 HARTFORD LIFE AND ACCIDENT
 INSURANCE COMPANY,
 20 Defendant.
 21

Case No. 3:16-cv-00103-JST
**STIPULATION FOR TWO-WEEK
 CONTINUANCE FOR REMAINING
 BRIEFING FOR CROSS -MOTION
 FOR JUDGMENT AND HEARING
 DATE; [~~PROPOSED~~] ORDER**
 Complaint Filed: January 7, 2016

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 24 For the reasons set forth below, the parties respectfully request that the Court
 25 permit a continuance of the following briefing schedule deadline and corresponding
 26 change in the hearing date:

27 ///
 28 ///

1 By and through their counsel of record, Plaintiff Hadar Meiri (“Meiri”) and
2 Defendant Hartford Life and Accident Insurance Company (“Hartford”), hereby
3 stipulate and respectfully request that the Court permit a two-week continuance of
4 the remaining briefing schedule deadlines with a corresponding change in the
5 hearing date. Good cause exists as follows:

6 Whereas in this ERISA case, the Court set a briefing schedule for the parties’
7 respective Cross-motions for Judgment under FRCP Rule 52. (Doc. 19) Plaintiff
8 Meiri filed her Motion for Judgment on October 19, 2016. Defendant Hartford
9 filed its Motion for Judgment on November 9, 2016.

10 Whereas the parties requested a continuance of the responsive motion
11 deadlines and trial due to the medical leave and rehabilitation of Plaintiff’s counsel,
12 Rebecca Grey, in late October, as well as limited availability of legal staff and
13 conflicts from winter holidays. The Court set the following dates: Plaintiff’s
14 responsive brief extended from November 30, 2016 to January 5, 2017;
15 Defendant’s responsive brief extended from December 21, 2016 to February 2,
16 2017; and the Motion hearing moved from January 12, 2017 to February 16, 2017,
17 at 2:00 p.m.

18 Since that time, in late November, Defendant’s counsel, Melissa M. Cowan,
19 had a trial set for January 30, 2016, in the United States District Court, Northern
20 District of California, in *Arlene Tom v. Hartford Life and Accident Insurance*
21 *Company*, Case No. 16-cv-01067. The pre-trial conference in that case is set for
22 January 18, 2017, and the district court has already confirmed trial will proceed as
23 scheduled. Ms. Cowan is the only attorney handling the *Meiri* case, such that the
24 January 30th trial will affect her ability to prepare and complete Hartford’s
25 responsive brief which is due that same week. Ms. Cowan’s husband is also
26 scheduled for surgery on January 25, 2017, and it cannot be moved.

27 Plaintiff filed her responsive brief on January 5, 2017, which included a
28 motion to strike a prior declaration filed by Defendant’s counsel. The parties met

1 and conferred and propose the following new schedule to accommodate these
2 unavoidable issues.

- 3 • Defendant's opposition to Plaintiff's motion to strike, currently due on
4 January 19, 2017, shall be extended to February 7, 2017.
- 5 • Plaintiff's reply for the motion to strike shall be extended to February 16,
6 2017
- 7 • Defendant's responsive brief for the cross-Motion for Judgment, currently
8 due on February 2, 2017, shall be extended to February 16, 2017.
- 9 • The parties request that the hearing date for both the cross-Motions for
10 Judgment and the Motion to Strike be moved from February 16, 2017 at
11 2:00 p.m., to March 9, 2017 at 2:00 p.m. The court's website reflects that
12 the Court is not available for hearings on March 2.

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14 IT IS SO STIPULATED

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16 Dated: January 13, 2017

The Grey Law Firm, P.C.
Rebecca Grey
Kate Rozenvasser

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18
19 By: /s/ Rebecca Grey [as authorized
on 1/13/17]

Rebecca Grey
Attorneys for Plaintiff Hadar Meiri

20
21 Dated: January 13, 2017

Burke, Williams & Sorensen, LLP
Melissa M. Cowan
Keiko J. Kojima

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24 By: /s/ Melissa M. Cowan

Melissa M. Cowan
Attorneys Defendant Hartford Life
and Accident Insurance Company

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PURSUANT TO STIPULATION, IT IS SO ORDERED:

DATED: January 18, 2017



Honorable Jon S. Tigar
United States District Court Judge