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10 Attorneys for Defendant Hartford Life and Accident  
 Insurance Company

11  
 12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

14  
 15 HADAR MEIRI, an individual,

16 Plaintiff,

17 v.

18 HARTFORD LIFE AND ACCIDENT  
 INSURANCE COMPANY,

19 Defendant.

Case No. 3:16-cv-00103-JST

**STIPULATION AND  
~~[PROPOSED]~~ ORDER FOR ONE-  
 WEEK CONTINUANCE OF  
 HEARING FOR CROSS-MOTIONS  
 FOR JUDGMENT UNDER FRCP  
 RULE 52 AND MOTION TO  
 STRIKE**

**CURRENT DATE: March 9, 2017  
 CURRENT TIME: 2:00 p.m.**

**PROPOSED DATE: March 16, 2017  
 PROPOSED TIME: 2:00 p.m.**

Complaint Filed: January 7, 2016

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 23  
 24 By and through their counsel of record, Plaintiff Hadar Meiri (“Meiri”) and  
 25 Defendant Hartford Life and Accident Insurance Company (“Hartford”), hereby  
 26 stipulate and respectfully request that the Court permit a one-week continuance of  
 27 the hearing date on all motions set for March 9 to March 16, 2017, at 2:00 p.m.

28 Good cause exists as follows:

1           Whereas counsel for Defendant Hartford, Melissa M. Cowan, learned on the  
2 afternoon of February 22, 2017, that her nine-year-old daughter would require  
3 surgery as soon as possible. For medical reasons, the surgery cannot be scheduled  
4 for two weeks. The surgeon has now confirmed that surgery will proceed on  
5 Thursday, March 9, 2017 at UCLA Medical Center in Los Angeles, California.

6           Whereas the parties' cross-Motions for Judgment under FRCP Rule 52 and  
7 Plaintiff's Motion to Strike are set to be heard at 2:00 p.m. on March 9, the same  
8 date as the surgery. Defendant's counsel requested that Plaintiff's counsel agree to  
9 a one-week continuance of the March 9<sup>th</sup> hearing to accommodate this unexpected  
10 medical matter. Plaintiff's counsel, Ms. Grey, graciously agreed.

11           All the briefing for the cross-Motions for Judgment (Doc. Nos. 21, 24, 29,  
12 34, 35) and Motion to Strike (Doc. Nos. 30, 33, 36) has been completed. The  
13 briefing on Defendant's Motion for Administrative Relief related to Plaintiff's  
14 opening Motion (Doc. Nos. 25, 26) has likewise been submitted.

15           Whereas the parties have confirmed that the court's calendar is still open for  
16 hearings on March 16 (although it is closed for hearings on March 9). The parties  
17 therefore request that the hearing date for both the Cross-Motions for Judgment and  
18 the Motion to Strike be moved from March 9, 2017 at 2:00 p.m., to March 16, 2017  
19 at 2:00 p.m. The parties seek only a one-week continuance of the hearing date.  
20 Currently, March 23 is not an available date for counsel. March 30 is also closed  
21 on the court's calendar for further hearings.

22           The parties previously requested two extensions of time related to the  
23 briefing for the cross-Motions for Judgment, with a commensurate continuance of  
24 the hearing date. The parties first requested a continuance of the responsive motion  
25 deadlines and trial due to the medical leave and rehabilitation of Plaintiff's counsel,  
26 Rebecca Grey, in late October, and other conflicts. (Doc. Nos. 27, 28) Plaintiff's  
27 responsive brief deadline was extended from November 30, 2016 to January 5,  
28

1 2017; Defendant's responsive brief was extended from December 21, 2016 to  
2 February 2, 2017; and the Motion hearing moved from January 12 to February 16,  
3 2017, at 2:00 p.m. The parties requested a second extension for Defendant's  
4 responsive brief and opposition to Plaintiff's Motion to Strike due to Defendant's  
5 counsel having to prepare for and participate in trial on January 30, 2017. (Doc.  
6 Nos. 31, 32) The court continued Defendant's opposition to Plaintiff's Motion to  
7 Strike from January 19 to February 7, 2017; Plaintiff's reply for the Motion to  
8 Strike to February 16, 2017; Defendant's responsive brief for the cross-Motion for  
9 Judgment from February 2 to February 16, 2017; and the hearing date for cross-  
10 Motions for Judgment and the Motion to Strike from February 16 to March 9, 2017  
11 at 2:00 p.m.

12 Due to this unforeseen medical matter, the parties respectfully request that  
13 the pending motions be heard on March 16, 2017 at 2:00 p.m., rather than March 9.

14 IT IS SO STIPULATED.

15 Dated: February 27, 2017

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

18 By: /s/ Rebecca Grey [as authorized on 2/27/17]  
19 Rebecca Grey  
Attorneys for Plaintiff Hadar Meiri

20 Dated: February 27, 2017

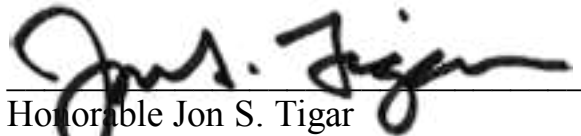
Burke, Williams & Sorensen, LLP  
Melissa M. Cowan

22 By: /s/ Melissa M. Cowan  
23 Melissa M. Cowan  
24 Attorneys Defendant Hartford Life  
and Accident Insurance Company

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PURSUANT TO STIPULATION, IT IS SO ORDERED:

DATED: February 27, 2017

  
Honorable Jon S. Tigar  
United States District Court Judge