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 12
 13 IN THE UNITED STATES DISTRICT COURT
 14 FOR THE NORTHERN DISTRICT OF CALIFORNIA

16 Erina Llamas,)	ACTION NO.: 16-cv-3293 WHO
)	
17 Plaintiff,)	STIPULATION AND ORDER
)	ORDER TO CONTINUE BRIEFING
18 v.)	BRIEFING SCHEDULE FOR
)	CROSS-MOTIONS FOR
19 Life Insurance Company of)	SUMMARY JUDGMENT
20 North America,)	
)	
21 Defendant.)	

22 It is hereby stipulated by and between the parties through their respective counsel that
 23 Plaintiff Erina Llamas and Defendant Life Insurance Company of North America may have
 24 additional time within which to file the administrative record and the their respective cross-
 25 motions for summary judgment in this matter.

26 Pursuant to Local Rule 6-1(b) the parties submit this request to continue the briefing

27
 28 Stipulation to Continue Briefing Schedule

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Case No: 16-3293 WHO

1 schedule in this matter for approximately thirty (30) days.

2 This is an ERISA long term disability case which will require the Court to review an
3 administrative record consisting of approximately two thousand (2000) pages.

4 During the course of briefing this matter plaintiff's counsel discovered that the
5 administrative record provided to him by defense counsel may not be complete. There are
6 nine hundred and ninety five (995) pages potentially at issue, but without reviewing and
7 comparing each document at issue, it is difficult to be certain.

8 Counsel discussed this matter on June 5, 2017, and are attempting to sort this issue
9 out with an eye toward providing the Court with one set of documents to review rather than
10 two. This will facilitate both counsels' citation to the record in their respective briefs and make
11 the court's review of the same more efficient.

12 Given the volume of documents involved, it will be difficult to resolve this issue prior to
13 the current due date for the parties' cross-motions.

14 Additionally, during the course of discussing the issues surrounding the administrative
15 record, counsel reopened their settlement negotiations and both sides would like additional
16 time to re-consider their respective positions.

17 In light of the forgoing, good cause exists to continue the briefing schedule in this matter
18 for approximately thirty (30) days.

19 Counsel propose the following changes to the briefing schedule:

Schedule	Current Dates	Stipulated New Dates
Opening Brief Due	June 7, 2017	July 5, 2017
Opposition Briefs Due	June 28, 2017	July 26, 2017
Reply Briefs Due	July 5, 2017	August 2, 2017
Hearing Date	July 19, 2017	August 23, 2017

25 This document is being filed through the Court's ECF system. In this regard, counsel
26 for plaintiff hereby attests that: 1) the content of this document is acceptable to all persons

27 _____

1 required to sign it; 2) defendant has concurred in the filing of this document; and 3) a record
2 supporting this concurrence is available for inspection or production if so ordered.

3 Respectfully submitted,

4 **ROBOOSTOFF & KALKIN**

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6
7 Dated: June 6, 2017

By: _____ /s
Scott Kalkin
Attorneys for Plaintiff

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10 **MESERVE, MUMPER & HUGHES LLP**

11 Dated: June 6, 2017

By: _____ /s
Anna M. Martin
Attorneys for Defendant
Life Insurance Company of
North America

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15 **~~PROPOSED~~ ORDER**

16 Good cause having been shown, the Court hereby continues the briefing schedule for
17 the parties' cross-motions as set forth above.

18
19 IT IS SO ORDERED.

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21 Dated: June 7, 2017

22 
William H. Orrick
United States District Judge