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6 Attorneys for Defendants  
 7 LISA CHANG and CAROL CHANG

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

11 MASSACHUSETTS MUTUAL LIFE )	Case No. 3:16-cv-3679 EMC
INSURANCE COMPANY, a Massachusetts )	
12 Corporation, )	<b>STIPULATION AND [PROPOSED]</b>
)	<b>ORDER TO CONTINUE THE CASE</b>
13 Plaintiff, )	<b>MANAGEMENT CONFERENCE</b>
)	<b>HEARING</b>
14 vs. )	
)	
15 LISA CHANG, an Individual, and CAROL )	
CHANG, as Conservator, )	
16 )	
Defendants. )	
17 )	

18  
 19 WHEREAS, on August 8, 2016, the Court entered an order setting a Case Management  
 20 Conference (“CMC”) in this action for October 6, 2016 at 9:30 a.m. in Courtroom 5, 17<sup>th</sup> Floor, 450  
 21 Golden Gate Avenue, San Francisco, California;

22 WHEREAS, on September 7, 2016 Defendants LISA CHANG and CAROL CHANG filed a  
 23 Motion to Dismiss Or, In the Alternative, to Stay this action (“Motion”);

24 WHEREAS, if granted, the aforementioned Motion would dispose of the present action or stay  
 25 it during the pendency of a state court action between Plaintiff MASSACHUSETTS MUTUAL LIFE  
 26 INSURANCE COMPANY, on the one hand, and Defendants LISA CHANG and CAROL CHANG on  
 27 the other hand and involving the same insurance policy giving rise to the present action (that state  
 28 court action is *Chang, et al. v. Massachusetts Mutual Life Insurance Company*, San Francisco County

1 Superior Court Case No. CGC-16-554087) thereby obviating the need for a CMC;

2 WHEREAS, if the aforementioned Motion is denied, a CMC could thereafter be promptly  
3 scheduled;

4 WHEREAS, the parties to this case have requested one previous time modification;  
5 specifically, a Stipulation to Extend Time to Respond to the Initial Complaint, filed on August 1, 2016  
6 and entered in the docket on August 5, 2016;

7 WHEREAS, the previous Stipulation to Extend Time to Respond to the Initial Complaint  
8 effected a one month extension of time (the Complaint was filed on June 30, 2016 and was served on  
9 the defendants on July 18, 2016, with a response to the Complaint originally due on August 8, 2016);

10 WHEREAS, a continuance of the currently-scheduled CMC to a date—if necessary—to follow  
11 the Court’s disposition of the pending Motion will potentially save the Court and the parties the time  
12 and expense attendant on preparing for a CMC that may become unnecessary depending on the  
13 disposition of the Motion;

14 WHEREAS, the hearing on the Motion is set for October 27, 2016;

15 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between  
16 Plaintiff MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY and Defendants LISA  
17 CHANG and CAROL CHANG, by and through their respective counsel, that:

18 1. The CMC currently scheduled for October 6, 2016 at 9:30 a.m. in Courtroom 5, 17<sup>th</sup>  
19 Floor, 450 Golden Gate Avenue, San Francisco, California—and all the associated dates—is and are  
20 hereby VACATED.

21 2. If this case remains pending and active following the hearing on the Defendants’  
22 Motion set for October 27, 2016, a CMC will re-set on an available date on the Court’s calendar  
23 following October 27, 2016.

24 Dated: September 16, 2016

PILLSBURY & COLEMAN, LLP

25  
26 By: */s/ Ingrid S. Leverett*

27 Terrence J. Coleman  
28 Ingrid S. Leverett  
Attorneys for Defendants  
LISA CHANG and CAROL CHANG

1 Dated: September 16, 2016

SYLVESTER, OPPENHEIM & LINDE

2  
3 By: /s/ Richard D. Oppenheim, Jr.

Richard D. Oppenheim, Jr.

Attorneys for Plaintiff

MASSACHUSETTS MUTUAL LIFE INSURANCE  
COMPANY

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7 Pursuant to Civil Local Rule 5-1(i)(3), the filer attests that concurrence in the filing of this  
8 document has been obtained from each of the signatories.

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

MASSACHUSETTS MUTUAL LIFE )  
INSURANCE COMPANY, a Massachusetts )  
Corporation, )  
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Plaintiff, )  
 )  
vs. )  
 )  
LISA CHANG, an Individual, and CAROL )  
CHANG, as Conservator, )  
 )  
Defendants. )

Case No. 3:16-cv-3679 EMC  
**[PROPOSED] ORDER TO CONTINUE THE  
CASE MANAGEMENT CONFERENCE  
HEARING**

Upon consideration of the foregoing Stipulation between the parties and the papers submitted to the Court, and good cause appearing in support thereof, this Stipulation is hereby GRANTED  
IT IS SO ORDERED. The CMC is reset from 10/6/16 to 12/15/16 at 9:30 a.m. A joint CMC statement shall be filed by 12/8/16.

Dated: 9/19/2016

HONORABLE EDWARD M. CHEN  
UNITED STATES DISTRICT COURT JUDGE

