1 2 3 4 5 6 7 8 9 10		DISTRICT COURT ISTRICT OF CALIFORNIA	
11	SAN FRANCISCO DIVISION		
12			
13	GLORIA NUNEZ,	Case No. 3:16-cv-07412-JST	
14	Plaintiff,	STIPULATED REQUEST FOR A	
 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 	v. PACIFIC GAS AND ELECTRIC COMPANY RETIREMENT PLAN, Defendant. PACIFIC GAS AND ELECTRIC COMPANY RETIREMENT PLAN, Counterclaim/Interpleader-Plaintiff, v. GLORIA NUNEZ, and ADRIANA VANESSA NUÑEZ, Interpleader Defendants.	21-DAY ENLARGEMENT OF TIME FOR ADRIANNA VANESSA NUÑEZ TO FILE A FEE PETITION (Dkt. 67, L.R. Civ. 6-3) and [proposed] ORDER	
	Nunez v. PG&E Retirement Plan, Case No. 16-cv-07412-JST		
	Stipulation to Enlargement of Time to File Fee Petition, and [proposed] ORDER		
		Dockets Justi	

1	Pursuant to Civil Local Rule 6-3, the undersigned counsel for Interpleader
2	Defendant Adrianna Vanessa Nuñez, and Plaintiff and Interpleader Defendant Gloria
3	Nuñez, hereby stipulate and agree as follows:
4	(1) Pursuant to the Court's Order of February 12, 2018 (Dkt. 67), Interpleader
5	Defendant Adrianna Vanessa Nuñez must file a fee petition, if any, no later than March
6	5, 2018.
7	(2) The undersigned counsel for Interpleader Defendant Adrianna Vanessa Nuñez
8	is serving as first-chair in a jury trial that commences Friday February 23, 2018, and runs
9	through March 9, 2018, at the earliest. The case is Kanellakopoulos v. Unimerica Life Insurance
10	Co., No. 15-cv-4674-BLF, proceeding before the Honorable District Judge Beth Freeman
11	in San Jose.
12	(3) Because of the time demands of the trial and trial preparation, it will not be
13	feasible for counsel to Adriana Vanessa Nuñez to generate a fee petition by the March 5,
14	2018 date currently prescribed by the Court's Order (Dkt. 67).
15	(5) There are no prior requests by the parties to enlarge time.
16	(6) Granting the instant Stipulation to enlarge the due date for a fee petition will
17	not affect any other date currently prescribed by the Court.
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	Nunez v. PG&E Retirement Plan, Case No. 16-cv-07412-JST

Nunez v. PG&E Retirement Plan, Case No. 16-cv-07412-JST Stipulation to Enlargement of Time to File Fee Petition, and [proposed] ORDER

1	WHEREFORE, the undersigned hereby stipulate and agree that the deadline for		
2	Interpleader Defendant Adrianna Vanessa Nuñez to file a fee petition, currently		
3	prescribed by the Court's Order of February 12, 2018 (Dkt. 67) shall be enlarged by		
4	twenty-one days, to and including March 26, 2018.		
5	Dated: February 20, 2018	CREITZ & SEREBIN LLP	
6			
7 8		By: <u>/s/ Joseph A. Creitz</u> Attorneys for Interpleader Defendant ADRIANA VANESSA NUÑEZ	
9 10	Dated: February 20, 2018	IBARRA PROFESSIONAL LAW Corporation	
11		By:/s/ Gener Benitez	
12		Gener Benitez Attorneys for Plaintiff and Interpleader	
13		Defendant GLORIA NUÑEZ	
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19 20	SIGNATURE ATTESTATION		
20	I hereby attest that I obtained the consent of all signatories hereto to the filing of		
21	this document.		
23	Dated: February 20, 2018	CREITZ & SEREBIN LLP	
24		By: /s/ Joseph A. Creitz	
25		Attorneys for Interpleader Defendant	
26		ADRIANA VANESSA NUÑEZ	
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	<i>Nunez v. PG&E Retirement Plan,</i> Case No. 16-cv-07412-JST Stipulation to Enlargement of Time to File Fee Petition, and [pa	roposed] ORDER 3	

1	[proposed] ORDER
2	Pursuant to the stipulation of the parties, and good cause appearing, the deadline
3	for Interpleader Defendant Adrianna Vanessa Nuñez to file a fee petition, if any, shall be
5	enlarged by twenty-one days, to and including March 26, 2018.
6	IT IS SO ORDERED
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8	Dated: February 21, 2018
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11	UNITED STATES DISTRICT JUDGE
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	Nunez v. PG&E Retirement Plan, Case No. 16-cv-07412-JST Stipulation to Enlargement of Time to File Fee Petition, and [proposed] ORDER 4