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4 Attorney for Plaintiffs
 5 LEAH ANN HERNANDEZ
 and JOSE RAMON HERNANDEZ

6 **UNITED STATES DISTRICT COURT**
 7 **NORTHERN DISTRICT OF CALIFORNIA**

9 LEAH ANN HERNANDEZ and JOSE
 10 RAMON HERNANDEZ,

11 Plaintiffs,

12 vs.

13 QBE INSURANCE CORPORATION, QBE
 14 AMERICAS, INC., and DOES 1 through
 15 100, inclusive,

16 Defendants.

Case No: 3:17-cv-02577

17 **STIPULATION AND ~~[PROPOSED]~~**
 18 **ORDER TO ALLOW LATE FILING OF**
 19 **OPPOSITION TO DEFENDANTS'**
 20 **MOTION TO DISMISS AND MOTION TO**
 21 **STRIKE AND TO CONTINUE THE JUNE**
 22 **20, 2017 HEARINGS ON THE MOTIONS**

23 Come now, Plaintiffs LEAH ANN HERNANDEZ and JOSE RAMON
 24 HERNANDEZ ("Plaintiffs") and defendants QBE PRAETORIAN INSURANCE
 25 CORPORATION AND QBE AMERICAS, INC. ("QBE") and stipulate as follows.

26 QBE filed a motion to dismiss and a motion to strike on May 11, 2017 and set both
 27 motions for hearing on June 20, 2107;

28 Plaintiffs' oppositions to both motions were due on May 25, 2017;

As of today, Plaintiffs have not filed any oppositions;

On May 31, 2017, Plaintiffs' counsel called QBE's counsel and advised that he had
 inadvertently failed to properly calendar the deadline to file oppositions because his
 assistant had been unexpectedly out of the office;

4824-7505-4410.1 Stipulation and [Proposed] Order to Allow Late Filing of Opposition to
 Defendant's Motion to Dismiss and Motion to Strike and to Continue the June 20, 2017
 Hearings on the Motions

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1 During the May 31, 2017 conversation, QBE's counsel asked Plaintiffs' counsel to
2 provide a proposed stipulation supporting Plaintiffs' request for leave to late file
3 oppositions; and

4 On June 2, 2017, Plaintiffs' counsel provided a proposed stipulation and proposed
5 order to defense counsel.

6 Now therefore, subject to this Court's approval, Plaintiffs and QBE ask this Court to
7 continue the deadline for Plaintiffs to file oppositions to both motions from May 25, 2017
8 to June 12, 2017 and continue the deadline for QBE to file reply briefs to June 19, 2017. To
9 accommodate Plaintiffs' counsel's vacation, Plaintiffs and QBE also ask this Court to
10 continue the hearing on both motions to July 11, 2017. SO STIPULATED

11 DATED: June 5, 2017

LAW OFFICES OF ETHAN A. GLAUBIGER

12
13 By: /s/ Ethan A. Glaubiger

Ethan A. Glaubiger

Attorneys for Plaintiffs LEAH ANN

HERNANDEZ AND RAMON HERNANDEZ

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16
17 DATED: June 5, 2017

LEWIS BRISBOIS BISGAARD & SMITH LLP

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19 By: /s/ Jerry Garcia

Rebecca R. Weinreich

Jerry Garcia

Attorneys for Defendants QBE INSURANCE
CORPORATION, QBE AMERICAS, INC.

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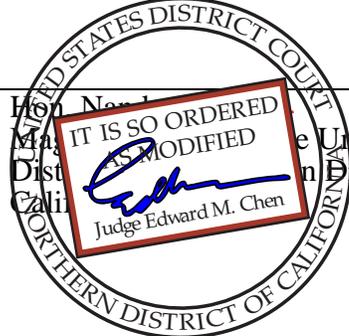
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~~[PROPOSED]~~ ORDER

In accordance with the above stipulation, and for good cause shown, it is hereby ordered that plaintiffs shall have leave to file oppositions to defendants' Motion to Dismiss and Motion to Strike. Opposition to both motions shall be filed not later than June 12, 2017 and any replies shall be filed not later than June 16, 2017.

13 1:30 p.m.

The hearing on both motions shall be continued to July ~~11~~, 2017 at ~~10:00 a.m.~~



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