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Glenn R. Kantor – SBN: 122643 E-mail: gkantor@kantorlaw.net Alan E. Kassan – SBN: 113864 E-mail: akantor@kantorlaw.net Andrew M. Kantor – SBN 303093 E-mail: akantor@kantorlaw.net KANTOR & KANTOR, LLP 19839 Nordhoff Street Northridge, CA 91324 Telephone: (818) 886-2525 Facsimile: (818) 350-6272 Attorneys for Plaintiff, 7 SUSAN MULLIN 8 9

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SUSAN MULLIN,

Plaintiff,

vs.

AMERICAN INCOME LIFE INSURANCE COMPANY,

Defendants.

CASE NO. 17-cv-05223-RS

STIPULATION TO CONTINUE DATES AS MODIFIED BY THE COURT

Plaintiff and defendants, by and through their respective counsel of record, hereby stipulate as follows:

Whereas, the discovery cut-off date is presently set for December 7, 2018;

Whereas, events (deemed critical to the resolution of the case by Plaintiff) took place after the filing of the Plaintiff's complaint and Defendant's answer, which altered the nature of the dispute;

Whereas, additional discovery is required by both parties to properly litigate this dispute;

Whereas, the parties also have reignited settlement discussions and will be mediating this case, and are in the process of agreeing on a mediator and satisfactory date;

Whereas, the parties are desirous of continuing all discovery deadlines for ninety (90) days as follows:

1	 All non-expert discovery to be completed by March 7, 2019;
2	 Parties to designate experts according to FRCP 26(a)(2) by February 5, 2019
3	• Parties to designate supplemental and rebuttal experts according to FRCP 26(a)(2) by
4	March 7, 2019
5	• Parties to complete all expert discovery according to 26(b)(4) by April 7, 2018;
6	Whereas, the parties are further desirous of continuing the trial dates accordingly:
7	• Final pretrial conference to be held on May 23, 2019 June 26, 2019.
8	• Jury trial to commence on June 10, 2019 July 8, 2019.
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10	IT IS SO STIPULATED and respectfully submitted by counsel listed below.
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12	Dated: KANTOR & KANTOR, LLP
13	By
14	Andrew M. Kantor
15	Glenn R. Kantor Attorneys for Plaintiff
16	SUSAN MULLIN
17	
18	Dated: HINSHAW & CULBERTSON LLP
19	By:
	Royal F. Oakes Attorneys for Defendant
20	AMERICAN INCOME LIFE INSURANCE
21	COMPANY
22	
23	Filer's Attestation: Pursuant to Local Rule 5-4.3.4(a)(2)(i) regarding signatures, Andrew M.
24	Kantor hereby attests that concurrence in the filing of this document and its content has been
25	obtained by all signatories listed.
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KANTOR & KANTOR LLP 19839 Nordhoff Street Northridge, California 91324 (818) 886 2525

<u>ORDER</u>

Having reviewed the parties' Stipulation to Continue the Discovery Cutoff Date, and for Good Cause Shown,

IT IS HEREBY ORDERED as follows:

That the cutoff date for discovery will be continued an additional ninety (90) days from

December 7, 2018 to March 7, 2019.

DATED: November 8, 2018

Honorable Richard Seeborg U.S. District Court Judge