

1 ROYAL F. OAKES (SBN 080480)
 roakes@mail.hinshawlaw.com
 2 MICHAEL A.S. NEWMAN (SBN 205299)
 mnewman@hinshawlaw.com
 3 HINSHAW & CULBERTSON LLP
 633 West 5th Street, 47th Floor
 4 Los Angeles, CA 90071-2043
 Telephone: 213-680-2800
 5 Facsimile: 213-614-7399

6 Attorneys for Defendant
 American Income Life Insurance Company
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8 **UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**

10 SUSAN MULLIN,
 11 Plaintiff,
 12 vs.
 13 AMERICAN INCOME LIFE INSURANCE
 14 COMPANY,
 15 Defendants.
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Case No. 17-cv-05223-RS
 (Honorable Richard Seeborg)

**STIPULATION TO EXTEND
 DATES SET FORTH IN THE
 COURT'S SCHEDULING
 ORDER; ~~[PROPOSED]~~ ORDER
 AS MODIFIED BY THE COURT**

Complaint Filed: September 8, 2017
 Discovery C/O: March 7, 2019
 Motion Hrng. C/O: May 9, 2019
 Pretrial Conf.: June 26, 2019
 Trial: July 8, 2019

1 **STIPULATION**

2 Plaintiff Susan Mullin (“Plaintiff”) and Defendant American Income Life
3 Insurance Company (“AIL”) (collectively “Parties”), by and through their respective
4 counsel of record, hereby stipulate as follows:

5 WHEREAS, the dispositive motion hearing cutoff is currently May 9, 2019,
6 the pretrial conference is set for June 26, 2019 and trial is set for July 8, 2019; and

7 WHEREAS, the parties have completed discovery with the exception of a
8 deposition to be taken in Texas, which was previously scheduled but continued by
9 counsel for both parties due to a calendar conflict; and

10 WHEREAS, the parties have commenced settlement discussions and wish to
11 continue those discussions, possibly in the context of a mediation session, without
12 the need to file dispositive motions in time to comply with the May 9, 2019 motion
13 hearing cutoff, and without the need to conduct the remaining deposition in Texas;

14 NOW THEREFORE THE PARTIES HEREBY STIPULATE AS
15 FOLLOWS:

16 The parties agree to request that the Court amend the Scheduling Order to
17 permit the taking of the Texas deposition not later than May 24, 2019, and to extend
18 the dispositive motion hearing cutoff date to June 27, 2019; and, the parties agree to
19 request that the Court continue the pretrial conference to August 14, 2019 and the
20 trial to August 26, 2019, or such dates as are convenient with the Court’s calendar.

21 IT IS SO STIPULATED.

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DATED: March 20, 2019

HINSHAW & CULBERTSON LLP

By: /s/ Royal F. Oakes

ROYAL F. OAKES
MICHAEL A.S. NEWMAN
Attorneys for Defendant
American Income Life Insurance
Company

DATED: March 20, 2019

KANTOR & KANTOR, LLP

By: /s/ Glenn R. Kantor

GLENN R. KANTOR
ALAN E. KASSAN
ANDREW M. KANTOR
Attorneys for Plaintiff
Susan Mullin

Filer's attestation: Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, Royal F. Oakes hereby attests that concurrence in the filing of this document and its contents has been obtained by all signatories listed.

1 ~~PROPOSED~~ ORDER

2 Having reviewed the Parties' Stipulation to Extend the Dates Set Forth in the
3 Court's Scheduling Order, and for good cause shown, IT IS HEREBY ORDERED
4 THAT:

- 5 • The Scheduling Order is amended to reflect a deadline to conduct the
6 Texas deposition ^{by} ~~of~~ May 24, 2019 [proposed May 24, 2019].
- 7 • The Scheduling Order is amended to reflect a dispositive motion
8 hearing cutoff date of June 27, 2019 [proposed June 27, 2019].
- 9 • The Scheduling Order is amended to reflect a pretrial conference date
10 of August 14, 2019 [proposed August 14, 2019].
- 11 • The Scheduling Order is amended to reflect a trial date of
12 August 26, 2019 [proposed August 26, 2019].

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14 IT IS SO ORDERED.

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16 DATED: 3/21, 2019



17 HONORABLE RICHARD SEEBORG
18 UNITED STATES DISTRICT JUDGE