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Attorneys for Defendant  
THE PRUDENTIAL INSURANCE COMPANY  
OF AMERICA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

COLLEEN GERAGHTY,  
  
Plaintiff,  
  
v.  
  
THE PRUDENTIAL INSURANCE  
COMPANY OF AMERICA; PRUCO  
SECURITIES; RYAN MOONEY, and  
DOES 1 to 10,  
  
Defendants.

Case No. 3:17-cv-06006-JST  
  
**STIPULATION AND REQUEST TO  
CONTINUE CASE MANAGEMENT  
CONFERENCE AND RELATED CASE  
DEADLINES; ~~PROPOSED~~ ORDER**  
  
Complaint Filed: October 19, 2017

**STIPULATION AND REQUEST**

Plaintiff Colleen Geraghty (“Plaintiff”) and Defendant The Prudential Insurance Company of America (“Defendant”) (collectively, the “Parties”) through their respective counsel hereby stipulate as follows:

WHEREAS the last day for Defendant to file a response to Plaintiff’s Complaint is January 17, 2018;

WHEREAS the Standing Order for Certain Employment Cases Pending Before United States District Judge Jon S. Tigar (Document 17-2) (“Standing Order”) requires that the parties produce certain documents and information within 30 days following Defendant’s submission of

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1 a responsive pleading or motion, i.e., by February 16, 2018;

2 WHEREAS the Standing Order further provides that “[t]he parties shall use the  
3 documents and information exchanged in accordance with the Initial Discovery Protocols to  
4 prepare the F.R.C.P. 26(f) discovery plan”;

5 WHEREAS Defendant needs an additional three weeks beyond February 16, 2018 to  
6 comply with the Standing Order’s required production of documents and information;

7 WHEREAS the deadline for the Parties to participate in a Rule 26(f) conference was  
8 January 3, 2018;

9 WHEREAS a Joint Case Management Statement, which will include the Parties’  
10 discovery plan, is currently due on January 16, 2018;

11 WHEREAS a Case Management Conference is currently scheduled for January 24, 2018;  
12 and;

13 WHEREAS in order to comply with the Standing Order’s requirement that the parties use  
14 the documents and information exchanged in accordance with the Initial Discovery Protocols to  
15 prepare a discovery plan, the Parties agree that a continuance of the Case Management  
16 Conference is necessary;

17 NOW, THEREFORE, IT IS HEREBY STIPULATED AND REQUESTED by and  
18 between the Parties through their respective attorneys of record that (1) the deadline for the  
19 Parties to produce certain documents and information pursuant to the Initial Discovery Protocols  
20 be extended to March 9, 2018, (2) the deadline for the Parties to participate in a Rule 26(f)  
21 conference be continued to March 28, 2018; (3) the deadline for the Parties to file a Joint Case  
22 Management Statement be continued to April 11, 2018, and (4) the Case Management  
23 Conference be continued to April 18, 2018.

24  
25 DATED: January 10, 2018

BROWN POORE LLP

26  
27 /s/ David M. Poore  
28 DAVID M. POORE  
Attorneys for Plaintiff  
COLLEEN GERAGHTY

1 DATED: January 10, 2018

LAFAYETTE & KUMAGAI LLP

2 /s/ Gary T. Lafayette  
3 GARY T. LAFAYETTE  
4 Attorney for Defendant  
5 THE PRUDENTIAL INSURANCE COMPANY  
6 OF AMERICA

7 **SIGNATURE ATTESTATION**

8 I hereby attest that I have obtained the concurrence of David M. Poore, counsel for  
9 Plaintiff, for the filing of this stipulation.

10  
11 /s/ Gary T. Lafayette  
12 GARY T. LAFAYETTE

13 **ORDER**

14 Good cause appearing therefor and pursuant to the parties' stipulation, it is hereby  
15 ORDERED that (1) the deadline for the Parties to produce certain documents and information  
16 pursuant to the Initial Discovery Protocols is extended to March 9, 2018, (2) the deadline for the  
17 Parties to participate in a Rule 26(f) conference is continued to March 28, 2018; (3) the deadline  
18 for the Parties to file a Joint Case Management Statement is continued to April 11, 2018, and (4)  
19 the Case Management Conference is continued to April 18, 2018 at 2:00 p.m.  
20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21  
22 DATED: January 11, 2018

23 Jon S. Tigar  
24 JON S. TIGAR  
25 United States District Judge  
26  
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28

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