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8 AETNA LIFE INSURANCE COMPANY,
ON BEHALF OF LEHMAN BROTHERS
9 HOLDINGS, INC.

10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 AETNA LIFE INSURANCE COMPANY,
14 ON BEHALF OF LEHMAN BROTHERS
HOLDINGS, INC.,

15 Plaintiff,

16 vs.

17 THOMAS KOHLER and DIANE KIMSEU
18 KOHLER,

19 Defendants.

Case No. C-11-00439-CW

**STIPULATION TO CONTINUE THE
DEADLINE TO FILE A MOTION FOR
ATTORNEY’S FEES AND COSTS**

20
21 This Stipulation to Continue the Deadline to File a Motion for Attorney’s Fees and Costs is
22 made and entered into by and among Plaintiff Aetna Life Insurance Company (the “Plaintiff”) and
23 Defendants Thomas Kohler and Diane Kimseu Kohler (“Defendants”) (collectively, “Parties”).

24 Pursuant to Federal Rule of Civil Procedure 54(2)(B)(i) and the Court’s Order Granting
25 Plaintiff’s Motion for Summary Judgment (Doc. No. 50), Plaintiff may file a motion for attorney’s
26 fees within fourteen days of the entry of Judgment (Doc. No. 51) on November 7, 2011. Thus,
27 Plaintiff’s deadline to file a motion for attorney’s fees and costs is November 21, 2011. The
28 Parties have met and conferred on November 15, 2011 as required under Local Rule 54-5 and

1 agreed that the Parties would benefit from additional time to further meet and confer regarding
2 Plaintiff's attorney's fees. The Parties agree and stipulate that, subject to the Court's approval of
3 this stipulation, the deadline for Plaintiff to file a motion for attorney's fees and nontaxable costs
4 will be continued until November 28, 2011. No other deadlines in the case would be affected.

5 IT IS SO STIPULATED.

6
7 DATED: November 17, 2011

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8 By: /s/ Clarissa A. Kang
9 Clarissa A. Kang
10 *Attorneys for Plaintiff*
11 Aetna Life Insurance Company, on behalf of
12 Lehman Brothers Holdings, Inc.

13 DATED: November 17, 2011

THE DOLAN LAW FIRM

14 By: /s/ Christopher Dolan
15 Christopher Dolan
16 *Attorneys for Defendants*
17 Thomas Kohler and Diane Kimseu Kohler

18 I attest that my firm has obtained Mr. Dolan's concurrence in the filing of this document.

19 TRUCKER ♦ HUSS

20 DATED: November 17, 2011

By: /s/ Clarissa A. Kang
Clarissa A. Kang

21
22 **PROPOSED** ORDER

23
24 PURSUANT TO STIPULATION, IT IS SO ORDERED.

25
26 DATED: November 21, 2011



27 Hon. Claudia Wilken
28 Judge of the United States District Court