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10 Attorneys for Defendant
 11 NORTHWESTERN MUTUAL LIFE INSURANCE
 12 COMPANY

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

DAVID GIANNINI, individually and on
 behalf of all others similarly situated and in
 the interest of the general public of the
 State of California;

Plaintiff,

vs.

NORTHWESTERN MUTUAL LIFE
 INSURANCE COMPANY, a Wisconsin
 Corporation, NORTHWESTERN
 MUTUAL – SAN FRANCISCO BAY
 AREA GROUP, INC., a California
 Corporation, JOHN GOODENOUGH, an
 individual, and DOES 1 through 20
 inclusive,

Defendants.

Case No. CV 12-0077-CW

**STIPULATION AND [PROPOSED]
 ORDER TO CONTINUE HEARING DATE
 ON PLAINTIFF’S MOTION TO REMAND**

Date: March 29, 2012
 Time: 2:00 p.m.
 Room: 2
 Judge: Hon. Claudia Wilken

1 Plaintiff David Giannini (“Plaintiff”) and Defendant Northwestern Mutual Life
2 Insurance Company (“Northwestern Mutual”) hereby stipulate as follows:

3 WHEREAS on February 6, 2012, Plaintiff filed a motion to remand this matter to
4 state court;

5 WHEREAS, the hearing on Plaintiff’s motion to remand is currently set for March
6 29, 2012 at 2:00 p.m.;

7 WHEREAS, counsel for Northwestern Mutual is unavailable to appear on March 29,
8 2012, and Plaintiff has agreed to continue the hearing on his motion to remand until April 6,
9 2012 to accommodate counsel for Northwestern Mutual;

10 IT IS HEREBY STIPULATED AND AGREED that the hearing on Plaintiff’s motion to
11 remand shall be heard on April 6, 2012 at 2:00 p.m.

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13 Dated: March 9, 2012

MORGAN, LEWIS & BOCKIUS LLP

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16 By: /s/ Rebecca D. Eisen
17 Rebecca D. Eisen

18 Attorneys for Defendant
19 NORTHWESTERN MUTUAL
20 LIFE INSURANCE COMPANY

21 Dated: March 9, 2012

BRADSHAW & ASSOCIATES, P.C.

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24 By: /s/ Drexel A. Bradshaw
25 Drexel A. Bradshaw

26 Attorneys for Plaintiff
27 DAVID GIANNINI
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[PROPOSED] ORDER

Pursuant to the stipulation of the parties, and for good cause shown, IT IS HEREBY ORDERED that the hearing on Plaintiff's motion to remand shall be heard on April 5, 2012, at 2:00 p.m.

Dated: 3/13/2012



Hon. Claudia Wilken
U.S. District Court Judge

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ECF ATTESTATION

I, Stephen L. Tausch, am the ECF User whose ID and Password are being used to file this **STIPULATION AND [PROPOSED] ORDER CONTINUING HEARING DATE ON PLAINTIFF’S MOTION TO REMAND**. In compliance with General Order 45 X.B, I hereby attest that Rebecca D. Eisen and Drexel A. Bradshaw have concurred in this filing.

Dated: March 9, 2012

MORGAN, LEWIS & BOCKIUS LLP

By /s/ Stephen L. Tausch
Stephen L. Tausch

Attorneys for Defendant
NORTHWESTERN MUTUAL LIFE
INSURANCE COMPANY