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MARSH & MCLENNAN AGENCY, LLC

12  
13 IN THE UNITED STATES DISTRICT COURT  
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA

15 MARSH & MCLENNAN AGENCY, LLC, a  
16 Delaware limited liability company,

17 Plaintiff,

18 v.

19 TEROS ADVISORS, LLC, a California  
20 limited liability company,

21 Defendant.

22 TEROS ADVISORS, LLC, a California  
23 limited liability company,

24 Counter-Claimant,

25 v.

26 MARSH & MCLENNAN AGENCY, LLC,  
27 a Delaware limited liability company,

28 Counter-Defendant.

Case No. 4:20-cv-02679-HSG

**STIPULATION AND ORDER DENYING  
CONTINUING DATES**

MMA Complaint Filed: April 17, 2020  
Teros Counter-Claim Filed: September 8, 2020  
Trial Date: November 15, 2021

1 Plaintiff and Counter-Defendant MMA (“MMA”) and Defendant and Counter-Claimant  
 2 Teros (“Teros”) (collectively “the Parties”) submit this stipulation and proposed order to continue  
 3 all dates in this matter by three months based on the fact that the current discovery cut-off is prior  
 4 to the first date on which Teros’s motion for judgment on the pleadings may be heard, based on the  
 5 Court’s docket and schedule.

6 WHEREAS, MMA served its Complaint on Teros on July 10, 2020;

7 WHEREAS, Teros filed its Answer and Counter-claim on September 8, 2020;

8 WHEREAS, MMA filed its Answer to Teros’s Counter-claim on September 28, 2020;

9 WHEREAS, the Court set the last day to mediate the case for January 29, 2021 and the  
 10 parties participated in a mediation on January 21, 2021 but were unable to resolve their disputes;

11 WHEREAS, the Court set the discovery cut-off for March 31, 2021;

12 WHEREAS, Teros intends to file a motion for judgment on the pleadings under FRCP  
 13 12(c) by no later than February 12, 2021;

14 WHEREAS, the earliest possible date that the motion for judgment on the pleadings may be  
 15 heard, based on the Court’s current docket, is May 6, 2021;

16 WHEREAS, the parties wish to obtain a ruling on Teros’s motion prior to engaging in  
 17 discovery;

18 THEREFORE, the parties stipulate to extend the cut-off dates for the above per the Court’s  
 19 directive, as follows:

20 Activity	Current Date	Parties’ Proposal	Court’s Modified Date
21 Fact Discovery Cut-off	March 31, 2021	June 30, 2021	
22 Expert Reports	May 7, 2021	July 9, 2021	
23 Rebuttal Reports	May 21, 2021	August 20, 2021	
24 Close of Expert 25 Discovery	June 14, 2021	September 17, 2021	
26 Hear Dispositive 27 Motions	August 12, 2021	November 12, 2021	
28 Pre-Trial Conference	November 2, 2021	February 8, 2022	
Trial	November 15, 2021	February 22, 2022	

1 Dated: February 12, 2021

MOUND COTTON WOLLAN & GREENGRASS  
LLP

2  
3 By: /s/Lawrence Hecimovich  
Jonathan Gross  
Lawrence Hecimovich  
Attorneys for TEROS ADVISORS, LLC

4  
5  
6 Dated: February 12, 2021

LITTLER MENDELSON

7  
8 By: /s/Benjamin Emmert  
Benjamin Emmert  
Attorneys for MARSH & MCLENNAN  
AGENCY LLC

9  
10 **SIGNATURE ATTESTATION**

11 Pursuant to the Northern District of California's Local Rule 5-1(i)(3), I attest that  
12 concurrence in the filing of the document has been obtained from each of the other Signatories.

13 Dated: February 12, 2021

14  
15 /s/Lawrence Hecimovich  
Lawrence Hecimovich

16  
17 **IT IS SO ORDERED.**

18 Dated: 2/16/2021



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