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6 Attorneys for Defendants TRAVELERS INDEMNITY
COMPANY OF CONNECTICUT and THE TRAVELERS
7 INDEMNITY COMPANY

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

11 THE MICHEL FAMILY TRUST,

12 Plaintiff,

13 vs.

14 TRAVELERS INDEMNITY COMPANY
OF CONNECTICUT, THE TRAVELERS
15 INDEMNITY COMPANY, and DOES 1 to
100, inclusive,

16 Defendants.

CASE NO. C09-04144 PVT

**STIPULATION TO CONTINUE
DEFENDANTS' DESIGNATION OF
EXPERTS AND HEARING DATE FOR
DISPOSITIVE MOTIONS;
XXXXXXXXXXXXXXXXX ORDER THEREON**

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19 TO THE HONORABLE PATRICIA V. TRUMBULL, U.S. DISTRICT COURT MAGISTRATE
20 JUDGE:

21 **STIPULATION**

22 WHEREAS, Plaintiff MICHEL FAMILY TRUST and Defendants TRAVELERS
23 INDEMNITY COMPANY OF CONNECTICUT and THE TRAVELERS INDEMNITY
24 COMPANY ("Travelers") desire to continue (1) Travelers' designation of expert witnesses, and
25 (2) the last day to have dispositive motions heard, on the following grounds:

26 1. Counsel for both parties have diligently worked to schedule percipient depositions,
27 but because of delays in document productions and scheduling depositions, counsel find that they
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1 cannot meet the existing deadlines for Travelers' designation of expert witnesses and the
2 dispositive motion hearing cut-off; and

3 2. This would be the first continuance in this matter.

4 NOW, THEREFORE, by and through their undersigned counsel of record, Plaintiff
5 MICHEL FAMILY TRUST and Defendants TRAVELERS INDEMNITY COMPANY OF
6 CONNECTICUT and THE TRAVELERS INDEMNITY COMPANY hereby stipulate to the
7 following:

8 1. The last day for Travelers to designate expert witnesses with reports is
9 continued to August 13, 2010; and

10 2. The last day for a hearing on dispositive motions is continued to
11 September 14, 2010.

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13 Respectfully submitted,

14 DATED: July 6, 2010

**FORAN GLENNON PALANDECH PONZI &
RUDLOFF PC**

15
16 By: /s/ Kathleen M. DeLaney
Kathleen M. DeLaney

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18 Attorneys for Defendants
**TRAVELERS INDEMNITY COMPANY OF
CONNECTICUT and THE TRAVELERS
INDEMNITY COMPANY**

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21 DATED: July 6, 2010

WILLIAMS, PINELLI & CULLEN, LLP

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23 By: /s/ Amy Carlson
Amy Carlson

24 Attorneys for Plaintiff
MICHEL FAMILY TRUST

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ORDER

IT IS HEREBY ORDERED, pursuant to the Stipulation of the parties, as follows:

1. The last day for Travelers to designate expert witnesses with reports is continued to August 13, 2010; and
2. The last day for a hearing on dispositive motions is continued to September 14, 2010.

Date: July 12, 2010



PATRICIA V. TRUMBULL
UNITED STATES MAGISTRATE JUDGE