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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
16 100, inclusive,

17 Defendants.

CASE NO. C09-04144 PVT

**STIPULATION TO CONTINUE DATE
FOR FILING MOVING PAPERS FOR
DISPOSITIVE MOTIONS;
[PROPOSED] ORDER THEREON**

18
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 extend the time for Travelers to file a motion for summary
25 judgment, without changing the hearing date or any other dates for filing opposition or reply
26 papers, on the following grounds:

27 1. Counsel for both parties have diligently worked to schedule percipient depositions,
28 but because of delays in document productions and scheduling depositions, Travelers has been

1 prevented from meeting the existing August 10, 2010 deadline for filing its motion for summary
2 judgment; and

3 2. This will not affect the last day for hearing dispositive motions 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 file and serve its motion for summary judgment shall
9 be August 17, 2010;

10 2. The last day for Plaintiff to file and serve its opposition to Travelers' motion for
11 summary judgment shall be August 24, 2010;

12 3. The last day for Travelers to file and serve its reply papers in support of its motion
13 for summary judgment shall be August 31, 2010; and

14 4. The last day for a hearing on dispositive motions shall remain September 14, 2010.

15 Respectfully submitted,

16 DATED: August 6, 2010

**FORAN GLENNON PALANDECH PONZI &
RUDLOFF PC**

18 By: /s/ Marjie D. Barrows
19 Marjie D. Barrows

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

23 DATED: August 6, 2010

WILLIAMS, PINELLI & CULLEN, LLP

25 By: /s/ Amy Carlson
26 Amy Carlson

27 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 file and serve its motion for summary judgment shall be August 17, 2010;
2. The last day for Plaintiff to file and serve its opposition to Travelers' motion for summary judgment shall be August 24, 2010;
3. The last day for Travelers to file and serve its reply papers in support of its motion for summary judgment shall be August 31, 2010 ; and
4. The last day for a hearing on dispositive motions shall remain September 14, 2010.

Date: August 9, 2010



PATRICIA V. TRUMBULL
UNITED STATES MAGISTRATE JUDGE