IT IS SO ORDERED 1 Counsel Appear On The Following Page 2 3 Judge Edward J. Davila 4 DATED: 12/9/201 5 6 7 UNITED STATES DISTRICT COURT 8 NORTHERN DISTRICT OF CALIFORNIA 9 10 NIA MUJADADI-TURAN, CASE NO. 5:15-CV-2752 (EJD) 11 Plaintiff, JOINT STIPULATION TO CONTINUE DEADLINE FOR DEFENDANTS 12 MOTOROLA MOBILITY, LLC AND V. METROPOLITAN LIFE INSURANCE 13 MOTOROLA MOBILITY, LLC; COMPANY TO RESPOND TO METROPOLITAN LIFE INSURANCE PLAINTIFF'S COMPLAINT 14 COMPANY, 15 Defendants. 16 17 18 19 20 21 22 23 24 25 26 27 28 CASE NO. 5-15-CV-2572(EJD) LITTLER MENDELSON, P.C. 50 W. San Fernando, 15th Floor San Jose, CA 95113.2303 Joint Stipulation To Continue Deadline For Defendants Motorola Mobility, LLC And Metropolitan Life Insurance 408.998.4150 Company To Respond To Plaintiff's Complaint

## JOINT STIPULATION

Pursuant to Civil Local Rule 6-1, Plaintiff Nia Mujadadi-Turan ("Plaintiff") and
Defendants Motorola Mobility, LLC ("Motorola") and Metropolitan Life Insurance Company
("MetLife") (Plaintiff, Motorola, and MetLife are referred to as the "Parties"), hereby jointly
stipulate to a fifth extension of time for Motorola and MetLife to respond to Plaintiff's Complaint
Pursuant to the Parties Agreement, the deadline for Motorola and MetLife to file their respective
responses to Plaintiff's Complaint will be continued from December 9, 2015 to January 8, 2016. In
support of this Stipulation, the Parties agree and stipulate as follows:
1. On June 18, 2015, Plaintiff initiated the present action against Motorola and

- MetLife in the United States District Court for the Northern District of California. (See ECF, Doc. No. 1.)
- 2. MetLife was served with the Summons and Complaint in this action on June 26, 2015.
- 3. Motorola was served with the Summons and Complaint in this action on July 21, 2015.
- 4. The Parties submitted stipulations extended the deadline for MetLife to respond to the Complaint to facilitate on-going settlement discussions (See ECF Doc. Nos. 11, 14, 20, 25, 29.) Where required, the Court granted each of these stipulations. (See ECF Doc. Nos. 22, 28, 31.)
- 5. The Parties submitted stipulations extended the deadline for Motorola to respond to the Complaint to facilitate on-going settlement discussions (See ECF Doc. Nos. 13, 21, 24, 30.) Where required, the Court granted each of these stipulations. (See ECF Doc. Nos. 23, 27, 32.)
- 6. On December 8, 2015, the Parties have agreed to a further thirty (30) day extension of time for Motorola and MetLife to respond to Plaintiff's Complaint. Accordingly, Motorola and MetLife's respective responses to the Complaint are now due on or before January 8, 2016.

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1	7. The Parties are optimistic that a resolution can be reached in this matter and
2	the additional time will afford the parties the opportunity to continue their settlement opportunities
3	without incurring additional costs of litigation.
4	8. This Stipulation will not alter the date of any event or any deadline already
5	fixed by Court order.
6	9. This is the sixth extension of time sought in this matter on behalf of MetLife
7	and the fifth extension of time sought on behalf of Motorola.
8	We hereby attest that we have on file all holographic signatures corresponding to any
9	signatures indicated by a conformed signature (/s/) within this e-filed document.
10	Dated: December 8, 2015
11	/s/ Beth A. Davis BETH A. DAVIS
12	Attorneys for Plaintiff NIA MUJADADI-TURAN
13	NIA MUJADADI-TUKAN
14	Dated: December 8, 2015
15	/s/ Benjamin A. Emmert BENJAMIN A. EMMERT
16	LITTLER MENDELSON, P.C. Attorneys for Defendant
17	MOTOROLA MOBILITY, LLC
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19	Dated: December 8, 2015
20	/s/ C. Andrew Kitchen C. ANDREW KITCHEN
21	MAYNARD, COOPER, & GALE, LLP Attorneys for Defendant
22	METRÓPOLITAN LIFE INSURANCE COMPANY
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