



1 Counsel Appear On The Following Page

2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

NIA MUJADADI-TURAN,  
 Plaintiff,  
 v.  
 MOTOROLA MOBILITY, LLC;  
 METROPOLITAN LIFE INSURANCE  
 COMPANY,  
 Defendants.

CASE NO. 5:15-CV-2752 (EJD)  
**JOINT STIPULATION TO CONTINUE  
 DEADLINE FOR DEFENDANTS  
 MOTOROLA MOBILITY, LLC AND  
 METROPOLITAN LIFE INSURANCE  
 COMPANY TO RESPOND TO  
 PLAINTIFF'S COMPLAINT**

1 **JOINT STIPULATION**

2 Pursuant to Civil Local Rule 6-1, Plaintiff Nia Mujadadi-Turan (“Plaintiff”) and  
3 Defendants Motorola Mobility, LLC (“Motorola”) and Metropolitan Life Insurance Company  
4 (“MetLife”) (Plaintiff, Motorola, and MetLife are referred to as the “Parties”), hereby jointly  
5 stipulate to a fifth extension of time for Motorola and MetLife to respond to Plaintiff’s Complaint.  
6 Pursuant to the Parties Agreement, the deadline for Motorola and MetLife to file their respective  
7 responses to Plaintiff’s Complaint will be continued from December 9, 2015 to January 8, 2016. In  
8 support of this Stipulation, the Parties agree and stipulate as follows:

9 1. On June 18, 2015, Plaintiff initiated the present action against Motorola and  
10 MetLife in the United States District Court for the Northern District of California. (See ECF, Doc.  
11 No. 1.)

12 2. MetLife was served with the Summons and Complaint in this action on June  
13 26, 2015.

14 3. Motorola was served with the Summons and Complaint in this action on July  
15 21, 2015.

16 4. The Parties submitted stipulations extended the deadline for MetLife to  
17 respond to the Complaint to facilitate on-going settlement discussions (See ECF Doc. Nos. 11, 14,  
18 20, 25, 29.) Where required, the Court granted each of these stipulations. (See ECF Doc. Nos. 22,  
19 28, 31.)

20 5. The Parties submitted stipulations extended the deadline for Motorola to  
21 respond to the Complaint to facilitate on-going settlement discussions (See ECF Doc. Nos. 13, 21,  
22 24, 30.) Where required, the Court granted each of these stipulations. (See ECF Doc. Nos. 23, 27,  
23 32.)

24 6. On December 8, 2015, the Parties have agreed to a further thirty (30) day  
25 extension of time for Motorola and MetLife to respond to Plaintiff’s Complaint. Accordingly,  
26 Motorola and MetLife’s respective responses to the Complaint are now due on or before January 8,  
27 2016.



1 Glenn Kantor - SBN 122643  
E-mail: gkantor@Kantorlaw.net  
2 Beth A. Davis - SBN 277560  
E-mail: bdavis@kantorlaw.net  
3 Andrew Kantor – SBN 303093  
E-mail: akantor@kantorlaw.net  
4 KANTOR & KANTOR, LLP  
19839 Nordhoff Street  
5 Northridge, CA 91324  
Telephone: (818) 886-2525  
6 Facsimile: (818) 350-6272

7 Attorneys for Plaintiff,  
NIA MUJADADI-TURAN  
8

9 BENJAMIN A. EMMERT, Bar No. 212157  
bemmert@littler.com  
10 LITTLER MENDELSON, P.C.  
A Professional Corporation  
11 50 West San Fernando Street  
15th Floor  
12 San Jose, CA 95113.2303  
Telephone: 408.998.4150  
13 Facsimile: 408.288.5686

14 Attorneys for Defendant  
MOTOROLA MOBILITY, LLC  
15

16 C. ANDREW KITCHEN (SBN 292609)  
dkitchen@maynardcooper.com  
17 LINDA B. OLIVER (SBN 166720)  
loliver@maynardcooper.com  
18 ALEXANDRA V. DRURY (SBN 291920)  
adrury@maynardcooper.com  
19 MAYNARD, COOPER, & GALE, LLP  
600 Montgomery Street, Suite 2600  
San Francisco, CA 94111  
20 Telephone: (415) 704-7433  
Facsimile: (205) 254-1999  
21

22 Attorneys for Defendant  
METROPOLITAN LIFE INSURANCE COMPANY  
23  
24  
25  
26  
27  
28