



1 *Counsel Appear On The Following Page*

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 NIA MUJADADI-TURAN,
11 Plaintiff,
12 v.
13 MOTOROLA MOBILITY, LLC;
14 METROPOLITAN LIFE INSURANCE
15 COMPANY,
16 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**

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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 sixth 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 January 8, 2016 to February 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, 37.) Where required, the Court granted each of these stipulations. (See ECF Doc. Nos.
19 22, 28, 31, 38.)

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, 37.) Where required, the Court granted each of these stipulations. (See ECF Doc. Nos. 23,
23 27, 32, 38.)

24 6. On January 7, 2016, 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 February 8,
27 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 seventh extension of time sought in this matter on behalf of
7 MetLife and the sixth 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: January 7, 2016

11 */s/ Beth A. Davis*
12 BETH A. DAVIS
13 Attorneys for Plaintiff
 NIA MUJADADI-TURAN

14 Dated: January 7, 2016

15 */s/ Benjamin A. Emmert*
16 BENJAMIN A. EMMERT
17 LITTLER MENDELSON, P.C.
18 Attorneys for Defendant
 MOTOROLA MOBILITY, LLC

19 Dated: January 7, 2016

20 */s/ C. Andrew Kitchen*
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