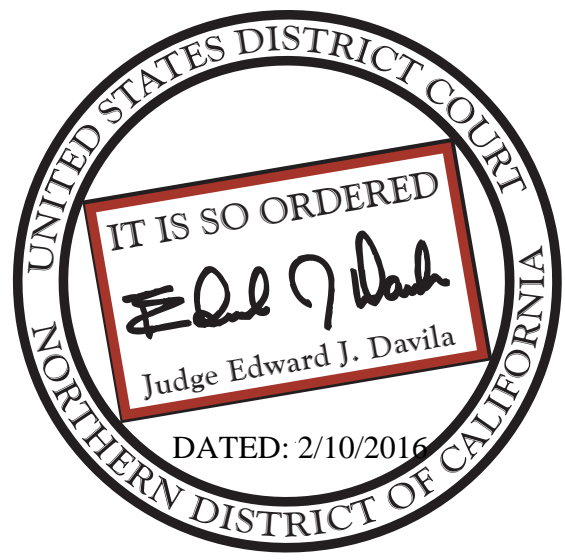


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Counsel Appear On The Following Page



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)
**FURTHER 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
2 **JOINT STIPULATION**

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

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

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

13 3. Motorola was served with the Summons and Complaint on July 21, 2015.

14 4. The Parties submitted stipulations extending the deadline for MetLife to
15 respond to the Complaint to facilitate on-going settlement discussions (See ECF Doc. Nos. 11, 14,
16 20, 25, 29, 37, 39.) Where required, the Court granted each of these stipulations. (See ECF Doc.
17 Nos. 22, 28, 31, 38, 40.)

18 5. The Parties submitted stipulations extending the deadline for Motorola to
19 respond to the Complaint to facilitate on-going settlement discussions (See ECF Doc. Nos. 13, 21,
20 24, 30, 37, 39.) Where required, the Court granted each of these stipulations. (See ECF Doc. Nos.
21 23, 27, 32, 38, 40.)

22 6. Since the last request, the Parties have been engaged in conversations
23 regarding either scheduling a settlement conference with a Magistrate Judge or retaining a private
24 mediator. While no firm date for a settlement conference or mediation has been set at this time, the
25 Parties are continuing to talk and are optimistic an agreement as to the form and the neutral will be
26 reached soon.

27 7. On February 5, 2016, the Parties agreed to a further thirty (30) day extension
28 of time for Motorola and MetLife to respond to Plaintiff’s Complaint. Motorola and MetLife’s
respective responses to the Complaint are now due on or before March 7, 2016.

