

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 vs.

13 MOTOROLA MOBILITY, LLC;
 14 METROPOLITAN LIFE INSURANCE
 COMPANY

15 Defendants.

) Case No.: 05:15-cv-2752-EJD
)
)

) **Hon. Edward J. Davila**
)

) **JOINT STIPULATION TO CONTINUE**
) **DEADLINE FOR DEFENDANTS TO**
) **RESPOND TO PLAINTIFF'S**
) **COMPLAINT**

) Complaint Filed: June 18, 2015
) Trial Date: TBD
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**JOINT STIPULATION TO CONTINUE DEADLINE FOR DEFENDANTS TO RESPOND TO
 PLAINTIFF'S COMPLAINT**

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19 Attorneys for Defendant
20 MOTOROLA MOBILITY, LLC

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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 an eighth extension of time for Motorola and MetLife to respond to Plaintiff’s
6 Complaint. Pursuant to the Parties’ Agreement, the deadline for Motorola and MetLife to file their
7 respective responses to Plaintiff’s Complaint will be continued from March 7, 2016 to April 4,
8 2016. In 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 26,
13 2015.

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

16 4. The Parties submitted stipulations extending the deadline for MetLife to respond to
17 the Complaint to facilitate on-going settlement discussions (See ECF Doc. Nos. 11, 14, 20, 25, 29,
18 37, 39, 42.) Where required, the Court granted each of these stipulations. (See ECF Doc. Nos. 22,
19 28, 31, 38, 40, 43.)

20 5. The Parties submitted stipulations extending the deadline for Motorola to respond to
21 the Complaint to facilitate on-going settlement discussions (See ECF Doc. Nos. 13, 21, 24, 30, 37,
22 39, 42.) Where required, the Court granted each of these stipulations. (See ECF Doc. Nos. 23, 27,
23 32, 38, 40, 43.)

24 6. Since the last request, the Parties have been engaged in conversations regarding
25

1 settlement and execution of a settlement agreement.

2 7. On March 7, 2016, the Parties agreed to a further twenty-eight (28) day extension of
3 time for Motorola and MetLife to respond to Plaintiff's Complaint. Accordingly, Motorola and
4 MetLife's respective responses to the Complaint are now due on or before April 4, 2016.

5 8. The Parties are optimistic that a resolution can be reached in this matter and the
6 additional time will afford the Parties the opportunity to continue their settlement opportunities
7 without incurring additional costs of litigation.

8 9. This Stipulation will not alter the date of any event or any deadline already fixed by
9 Court order.

10 We hereby attest that we have on file all holographic signatures corresponding to
11 any signatures indicated by a conformed signature (/s/) within this e-filed document.

12
13 Date: March 7, 2016

MAYNARD, COOPER, & GALE, LLP

14 By: /s/ Linda B. Oliver
15 Linda B. Oliver
16 Attorneys for Defendant
METROPOLITAN LIFE INSURANCE COMPANY

17 Date: March 7, 2016

KANTOR & KANTOR, LLP

18 By: /s/ Glenn Kantor
19 Glenn Kantor
20 Attorneys for Plaintiff
NIA MUJADADI-TURAN

21 Date: March 7, 2016

LITTLER MENDELSON, P.C.

22 By: /s/ Benjamin A. Emmert
23 Benjamin A. Emmert
24 Attorneys for Defendant
MOTOROLA MOBILITY, LLC

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CERTIFICATE OF SERVICE

I am employed in the County of San Francisco State of California. I am over the age of eighteen years and not a party to this action. My business address is 600 Montgomery Street, Suite 2600, San Francisco, CA 94111. On March 7, 2016, I served a copy of the following documents:

JOINT STIPULATION TO CONTINUE DEADLINE FOR DEFENDANTS TO RESPOND TO PLAINTIFF’S COMPLAINT

[x] CM/ECF ELECTRONIC SERVICE: The following are registered CM/ECF users with the Court, and have consented to service through the Court’s automatic transmission of a notice of electronic filing.

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Attorneys for Defendant MOTOROLA MOBILITY, LLC

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on March 7, 2016, at San Francisco, California.



Mila Dunn