UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

MARY ANN SIVOLELLA, for the use and benefit of the EQ/Common Stock Index Portfolio, the EQ/Equity Growth PLUS Portfolio, the EQ/Equity 500 Index Portfolio, the EQ/Large Cap Value PLUS Portfolio, the EQ/Global Multi-Sector Equity Portfolio, the EQ/Mid Cap Value PLUS Portfolio, the EQ/GAMCO Small Company Value, and the EQ/Intermediate Government Bond Index Portfolio,

Plaintiff,

VS.

AXA EQUITABLE LIFE INSURANCE COMPANY and AXA EQUITABLE FUNDS MANAGEMENT GROUP, LLC.

Defendants.

GLENN D. SANFORD, et al.,

Plaintiffs,

VS.

AXA EQUITABLE FUNDS MANAGEMENT GROUP, LLC,

Defendant.

Civil Action No. 3:11-cv-04194 (PGS) (DEA)

and

Civil Action No. 3:13-cv-00312 (PGS) (DEA)

JOINT STIPULATION AND [PROPOSED] ORDER REGARDING PAGE LIMIT FOR REPLY BRIEFS

WHEREAS, Plaintiffs and Defendants (the "Parties") served respective summary judgment motions on January 23, 2015 (the "Summary Judgment Motions").

WHEREAS, the Parties served oppositions to the Summary Judgment Motions on March 20, 2015 (the "Summary Judgment Opposition Briefs");

WHEREAS, the Parties must file respective reply briefs in further support of the Summary Judgment Motions by May 4, 2015 (the "Reply Briefs");

WHEREAS, the Defendants seek an extension of the page limitation set forth in the Local Rules for this District for Defendants' Reply Brief, and Plaintiffs' have consented to that request:

WHEREAS, the Parties agree, subject to the approval of the Court, that given the number of pages of the Summary Judgment Opposition Briefs and to allow the parties to appropriately address the arguments raised therein, the page limitation for the Reply Briefs relating to the Summary Judgment Motions set forth in Rules 7.2(b) and 7.2(d) of the Local Civil Rules for this District is increased from 11.25 pages using 12-point proportional font to 20 pages using 12point proportional font (or 27 pages using 14-point proportional font);

NOW, THEREFORE, the Parties hereby STIPULATE AND AGREE, by and through their undersigned counsel and subject to the Court's approval, as follows:

1. The Parties may submit Reply Briefs to the Summary Judgment Motions that do not exceed 20 pages using 12-point proportional font (or 27 pages using 14-point proportional font).

By: /s/ Robert L. Lakind Robert L. Lakind SZAFERMAN, LAKIND, BLUMSTEIN & BLADER, P.C. 101 Grovers Mill Road, Suite 200 Lawrenceville, NJ 08648

Tel: (609) 275-0400 Fax: (609) 275-4511

Attorneys for Plaintiffs

By: /s/ Jonathan M. Korn

Jonathan M. Korn **BLANK ROME LLP**

301 Carnegie Center, 3rd Floor

Princeton, NJ 08540 Tel: (609) 750-7700 Fax: (609) 897-7395

MILBANK, TWEED, HADLEY & McCLOY

LLP

James N. Benedict (pro hac vice) Sean M. Murphy (pro hac vice) 1 Chase Manhattan Plaza New York, NY 10005 (212) 530-5000

Attorneys for Defendants
Plane use 14- point fend
Plane use 14- point fend
Plane use 14- point fend

Hon. Peter G. Sheridan

United States District Judge

SO ORDERED.

April 15, 2015