

1 STIPULATION

2 Plaintiff Centre for Neuro Skills (“CNS”) and Defendants Blue Cross Blue Shield of
3 Oklahoma (“BCBSOK”) and William H. McKnight (“McKnight”) respectfully request that the
4 Court continue the Mandatory Settlement Conference from December 16, 2011 to January 19
5 or 20, 2012 because Mr. McKnight is presently in Texas attending a job training and is unable
6 to return to California for the Settlement Conference. He will be back in California on January
7 19 and 20, 2012. Additionally, BCBSOK tendered the defense of the case to the Helmreich &
8 Payne Employee Welfare Benefit Plan (“Plan”), and the Plan recently accepted the tender. A
9 representative from the Plan is not available on December 16, 2011 to attend the Settlement
10 Conference. Finally, counsel for CNS has two depositions scheduled for December 16, 2011 in
11 San Jose, California.

12 To refresh the Court’s recollection regarding the specifics of this case, this is a dispute
13 regarding payment for the medical care rendered to Charlene McKnight, who was a beneficiary
14 of McKnight. McKnight, who is a *pro se* litigant, acknowledged in the Joint Scheduling Report
15 that BCBSOK sent checks to him to pay for the medical care CNS rendered to Charlene
16 McKnight, that he cashed those checks, and that he used the funds from the checks for purposes
17 other than paying CNS.

18 McKnight represents that he has been unemployed for a period of time, but that he is
19 currently in a job training program with Shell Oil that might lead to a permanent position. He
20 also represents that he will not be able to put funds forward to settle this dispute if he is not
21 hired by Shell or another employer. Logically, it is in his best interests, and the interests of the
22 other Parties to this case, that he complete the training and secure a permanent position.

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1 For the above stated reasons, the Parties respectfully submit this Stipulated Request to
2 Continue the Mandatory Settlement Conference to January 19 or 20, 2012.

3 **IT IS SO STIPULATED:**

4 Date: December 12, 2011

LAW OFFICES OF JOHN C. HALL

5
6 By: /S/ John C. Hall
John C. Hall

7 Attorneys for Plaintiff
8 CENTRE FOR NUERO SKILLS

9 Date: December 12, 2011

10 WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP

11 By: /S/ Donald P. Sullivan
12 Donald P. Sullivan

13 Attorneys for Defendant
14 BLUE CROSS BLUE SHIELD OF
OKLAHOMA

15
16 Date: December 12, 2011

17 By: /S/ William H. McKnight
William H. McKnight

18 *In propria persona*

19 **ORDER**

20 Good cause appearing, the settlement conference, currently scheduled on December 16, 2011
21 is **CONTINUED** to January 19, 2012 at 10:00 a.m.

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24 IT IS SO ORDERED.

25 Dated: **December 13, 2011**

/s/ Jennifer L. Thurston
26 UNITED STATES MAGISTRATE JUDGE