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Hartford Life and Accident Insurance Company

11 **UNITED STATES DISTRICT COURT**
 12 **EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO**

14 FADI G. HADDAD, M.D.,
 15 Plaintiff,
 16 v.
 17 SMG LONG TERM DISABILITY
 PLAN, AND HARTFORD LIFE
 18 AND ACCIDENT INSURANCE
 COMPANY,
 19 Defendants.
 20

Case No. 2:16-cv-01700-WHO
**STIPULATION AND [PROPOSED]
 ORDER TO FURTHER CONTINUE
 BRIEFING AND HEARING
 SCHEDULE RE BENEFIT
 CALCULATIONS**
 Honorable William H. Orrick

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 22 Plaintiff Fadi G. Haddad, M.D., and Defendant Hartford Life and Accident
 23 Insurance Company, through counsel, hereby stipulate and request a 14-day
 24 extension based on the following:

- 25 1. Plaintiff filed his opening brief re benefit calculations on March 16,
 26 2021. [Dkt. 106] Defendant Hartford’s responsive brief is due on April 2, 2021.
- 27 2. Following the submission of Plaintiff’s opening brief, the parties have
 28 had further discussions regarding the calculation of the pre-disability monthly

1 earnings (PDE) to see if they can reach an agreement without Court intervention.
2 They also discussed trying to reach a global settlement regarding the pre-disability
3 monthly earnings issue, the loan forgiveness issue (which the Court previously
4 remanded back to the administrator) and the prejudgment interest.

5 3. The parties request a 14-day extension on the briefing to see if such an
6 agreement can be worked out without further briefing and expense. Therefore, the
7 parties respectfully request the following dates be continued by 14 days:

- 8 • Defendant's Response/Accompanying Declaration answering the
9 Court's questions continued from April 2, 2021 to **April 16, 2021**
- 10 • Plaintiff's Reply continued from April 9, 2021 to **April 23, 2021**
- 11 • Hearing continued from April 27, 2021 to **May 11, 2021 at 2 p.m.**

12 IT IS SO STIPULATED.

13
14 Dated: March 30, 2021

LAW OFFICES OF LAURENCE F. PADWAY

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16 By: /s/ Laurence F. Padway

Laurence F. Padway

Attorneys for Plaintiff Fadi G. Haddad, M.D.

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19 Dated: March 30, 2021

BURKE, WILLIAMS & SORENSEN, LLP

20 By: /s/ Michael B. Bernacchi

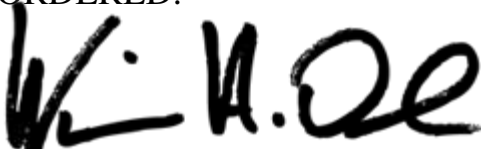
Michael B. Bernacchi

Attorneys for Defendant Hartford Life and
Accident Insurance Company

21
22
23 **ORDER**

24 Good cause appearing, IT IS SO ORDERED.

25
26 Dated: March 30, 2021



Honorable William H. Orrick
United States District Judge