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 Accident Insurance Company*

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

15 FADI G. HADDAD, M.D.,

16 Plaintiff,

17 v.

18 SMG LONG TERM DISABILITY  
 19 PLAN, AND HARTFORD LIFE  
 AND ACCIDENT INSURANCE  
 20 COMPANY,

21 Defendants.

Case No. 2:16-cv-01700-WHO

**STIPULATION TO CONTINUE  
 MOTION CUT-OFF RE:  
 DISCOVERY BY SIX WEEKS; and  
 ORDER**

22  
 23 Plaintiff Fadi G. Haddad, M.D. (“Plaintiff”) and Defendant Hartford Life and  
 24 Accident Insurance Company (“Hartford”) hereby agree to continue the deadline to  
 25 file a joint brief regarding any discovery dispute as follows:

26  
 27 1. WHEREAS, under Local Rule 37-3 discovery motions/briefs must be  
 28 filed within 7 days after the discovery cut-off.

1           2.       WHEREAS, the discovery cut-off in this case was February 24, 2017,  
2 requiring any briefing regarding discovery disputes be filed by March 3, 2017.

3  
4           3.       WHEREAS the parties currently have a discovery dispute which they  
5 are meeting and conferring over. The parties hope to resolve the issue but, if not,  
6 they request six weeks to file a joint discovery brief. The extra-time is needed both  
7 because the dispute itself has only recently arisen and thus the parties need more  
8 time to meet and confer and Plaintiff's counsel is undergoing a medical procedure  
9 in early March and will likely not be able to devote time to discovery issues while  
10 he is recuperating. No other case management dates will be impacted by this  
11 stipulation.

12  
13           4.       IT IS THEREFORE STIPULATED that the deadline to file a joint  
14 brief regarding any discovery dispute will be continued from February 24, 2017 to  
15 April 7, 2017.

16  
17  
18 Dated: February 28, 2017

Law Offices of Laurence F. Padway

19 By: */s/ Laurence F. Padway*  
20 *[As authorized on*  
21 *Laurence F. Padway*  
22 *Attorneys for Plaintiff*  
*Fadi G. Haddad, M.D.*

23 Dated: February 28, 2017

Burke, Williams & Sorensen, LLP

24 By: */s/ Michael B. Bernacchi*  
25 *Michael B. Bernacchi*  
26 *Cindy Mekari*  
27 *Attorneys for Defendant*  
*Hartford Life and Accident Insurance*  
*Company*

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**ATTESTATION PURSUANT TO GENERAL ORDER 45**

I, Laurence F. Padway, attest that concurrence in the filing of this document has been obtained from the other Signatory.

Dated: February 28, 2017


/S/ Laurence F. Padway  
LAURENCE F. PADWAY  
Attorneys for Plaintiff

**ORDER**

Pursuant to stipulation, and good cause appearing, IT IS HEREBY ORDERED that the deadline to file a joint brief regarding any discovery dispute will be continued from February 24, 2017 to April 7, 2017.

IT IS SO ORDERED.

Dated: February 28, 2017

  
\_\_\_\_\_  
Hon. William H. Orrick III  
United States District Judge