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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  
 PLAN, AND HARTFORD LIFE  
 19 AND ACCIDENT INSURANCE  
 COMPANY,

20 Defendants.  
 21

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

**STIPULATION TO CONTINUE  
 MOTION CUT-OFF RE:  
 DISCOVERY BY ONE WEEK; and  
 [PROPOSED] 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 a briefing regarding discovery disputes be filed by March 3, 2017. One  
3 previous extension has been requested and granted. The joint brief regarding any  
4 discovery dispute is currently due on April 7, 2017.

5  
6           3.       WHEREAS the parties currently have a discovery dispute on which  
7 they are meeting and conferring, and preparing a joint statement for the Court. The  
8 parties are hopeful that they will resolve the issue but, if not, they request an  
9 additional week to file a joint discovery letter. No other case management dates  
10 will be impacted by this stipulation.

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

15  
16  
17 Dated: April 7, 2017

Law Offices of Laurence F. Padway

18                   By: /s/ Laurence F. Padway  
19                   Laurence F. Padway  
20                   Attorneys for Plaintiff  
21                   Fadi G. Haddad, M.D.

22  
23 Dated: April 7, 2017

Burke, Williams & Sorensen, LLP

24                   By: /s/ Michael B. Bernacchi  
25                   Michael B. Bernacchi  
26                   Cindy Mekari  
27                   Attorneys for Defendant  
28                   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: April 7, 2017

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

**(PROPOSED) 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 to April 7, 2017 to April 14, 2017.

IT IS SO ORDERED.

Dated: April 7, 2017

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