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MILLER LAW GROUP
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14
 15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA

18 PAUL MAZUR,

19 Plaintiff,

20 v.

22 PACIFIC TELESIS GROUP
 23 COMPREHENSIVE DISABILITY BENEFITS
 PLAN, AT&T UMBRELLA BENEFIT PLAN
 NO. 1, and DOES 1 through 50, Inclusive,

24 Defendants.
 25

Case No.: C 07-01904 JSW

**STIPULATION AND [PROPOSED] ORDER
 CONTINUING HEARING ON PARTIES'
 CROSS-MOTIONS FOR SUMMARY
 JUDGMENT**

Complaint filed: April 4, 2007

1 The parties stipulate as follows:
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3 Magistrate Judge James ordered Defendants to produce various documents in
4 response to Plaintiff's Motion to Compel Production of Documents. Defendants produced
5 over 4,000 pages of documents to Plaintiff in response to the Court's Order on October 27,
6 2008. To provide the parties additional time to resolve continuing disputes relating to
7 Magistrate Judge James' order, on the November 10, 2008, the parties stipulated to an
8 Order Continuing Briefing Schedule and Hearing On Parties' Cross-Motions For Summary
9 Judgment, which the Court signed. Since November 10, 2008, the parties have engaged in
10 good faith meet and confer efforts, most recently through an in-person meeting on
11 November 21, 2008.
12

13 As a result of this in-person meeting, the parties are proceeding with additional
14 document review and analysis and limited additional document production in an effort to
15 resolve these issues without seeking Court intervention. This process will require
16 meaningful time to complete. In the event that the parties are unable to resolve all of the
17 outstanding disputes informally, they will require further time to seek resolution from
18 Magistrate Judge James, to allow the Court sufficient time to rule on any remaining
19 discovery issues, and to comply with any further order of the Court. Additionally, Defense
20 Counsel Katherine Kettler will be unavailable From November 24th through December 4th
21 due to an arbitration and related commitments. Accordingly, the parties will not be able to
22 resolve these discovery issues in time to comply with the briefing schedule set by the Court
23 in its November 10, 2008 Order. The parties hereby stipulate to an order extending the
24 briefing schedule set by the Court as follows:
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26 January 16, 2009	Plaintiff's last day to file/serve an Amended Cross 27 Motion and Opposition for Summary Judgment.
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February 20, 2009	Defendants' last day to file/serve an Opposition to Plaintiff's Cross-Motion and Reply for Summary Judgment.
March 6, 2009	Plaintiff's last day to file/serve a Reply Brief.
_____, 2009	Last day for the parties to file the Joint Case Management Conference Statement.
_____, 2009	9:00 a.m. hearing on Cross-Motions for Summary Judgment.
_____, 2009	Further Case Management Conference immediately following the hearing on the parties' Cross-Motions for Summary Judgment.

IT IS SO STIPULATED.

Dated: November 21, 2008

MILLER LAW GROUP
A Professional Corporation

By: _____ /s/
KATHERINE L. KETTLER
Attorneys for Defendants AT&T Umbrella
Plan No. 1 and Pacific Telesis Group
Comprehensive Disability Benefits Plan

Dated: November 21, 2008

TEAL & MONTGOMERY

By: _____ /s/
MICHAEL S. HENDERSON
Attorneys for Plaintiff Paul Mazur

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SAN FRANCISCO, CALIFORNIA


[PROPOSED] ORDER

For good cause shown, the Court HEREBY ORDERS that parties' briefing schedule on the parties' Cross-Motions For Summary Judgment is extended and continued as follows:

- January 16, 2009 Plaintiff's last day to file/serve an Amended Cross Motion and Opposition for Summary Judgment.
- February 20, 2009 Defendants' last day to file/serve an Opposition to Plaintiff's Cross-Motion and Reply for Summary Judgment.
- March 6, 2009 Plaintiff's last day to file/serve a Reply Brief.
- April 10, 2009 Last day for the parties to file the Joint Case Management Conference Statement.
- April 17, 2009 9:00 a.m. hearing on Cross-Motions for Summary Judgment.
- April 17, 2009 Further Case Management Conference immediately following the hearing on the parties' Cross-Motions for Summary Judgment.

IT IS SO ORDERED.

Dated: November 24, 2008



 JEFFREY S. WHITE
 UNITED STATES DISTRICT JUDGE

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