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5 Attorneys for Defendant  
JP Morgan Retirement Services, LLC dba JP  
6 Morgan Compensation and Benefit Strategies,  
as Successor in Interest to CCA Strategies  
7 LLC, and Chicago Actuaries, LLC

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

11 SHARTSIS FRIESE LLP,

12 Plaintiff,

13 v.

14  
15 JP MORGAN COMPENSATION AND  
16 BENEFIT STRATEGIES as Successor in  
Interest of CCA STRATEGIES LLC and  
17 CHICAGO CONSULTING  
ACTUARIES, LLC and DOES 1-10,

18 Defendants.  
19

Case No. CV-08-01064 (SC)

**STIPULATION TO AMEND SCHEDULING  
ORDER PERTAINING TO MOTION TO  
COMPEL RESPONSES TO SPECIAL  
INTERROGATORIES, SET ONE;  
~~PROPOSED~~ ORDER**

Courtroom: 1, 17th Floor  
Judge: Hon. Samuel Conti  
Trial Date: June 8, 2009

20  
21 WHEREAS, on August 15, 2008, the Court entered a status conference order  
22 setting the times for compliance with certain rules of court (the "Scheduling Order"),  
23 including that all discovery be completed and all depositions be taken by April 8, 2009;  
24 and all Motions be heard no later than May 1, 2009;

25 WHEREAS, Defendant, JP Morgan Retirement Services LLC d/b/a JP Morgan  
26 Compensation and Benefit Strategies, requested an extension of time to respond to  
27 Plaintiff's Special Interrogatories, Set One;

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1 WHEREAS, Defendant has agreed that, while it may object to Plaintiff's Special  
2 Interrogatories, it will provide substantive responses subject to those objections to the  
3 best of its ability;

4 WHEREAS the parties, Plaintiff, Shartsis Friese LLP, and Defendant, wish to  
5 modify the Scheduling Order to extend the cutoff for hearing dates for one week and to  
6 extend the deadline for Plaintiff to file a motion to compel responses or further responses  
7 to its Special Interrogatories, Set One, to Defendant;

8 WHEREAS, the parties are not stipulating to shorten the notice period for such  
9 motion, but rather, any such motion must be heard on statutory notice or Plaintiff must  
10 obtain permission from the Court to shorten the notice period;

11 THE PARTIES HEREBY STIPULATE to and request that the Court amend its  
12 Scheduling Order as follows:

13 The last day for hearing of Plaintiff's motion to compel, should such motion be  
14 filed, shall be extended to May 8, 2009;

15 Plaintiff may file its motion to compel responses or further responses to its Special  
16 Interrogatories, Set One, no later than April 24, 2009.

17 SO STIPULATED.

18 KLINEDINST PC

SHARTSIS FRIESE, LLP

19  
20 By: /s/ Connie M. Anderson  
21 John D. Klinedinst  
22 Connie M. Anderson  
23 Attorneys for Defendant  
24 JP Morgan Chase Compensation  
and Benefit Strategies, as successor in interest  
to CCA Strategies, LLC,  
and Chicago Actuaries, LLC

By: /s/ Lisa A. Jacobs  
Arthur J. Shartsis  
Lisa A. Jacobs  
Attorneys for Plaintiff  
Shartsis Friese, LLP

25 PURSUANT TO STIPULATION, IT IS SO ORDERED



26  
27  
28 The Honorable  
United States District Court,  
Northern District of California