

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

RIMAC & MARTIN
A Professional Corporation
JOSEPH M. RIMAC – CSBN 72381
WILLIAM REILLY – CSBN 177550
1051 Divisadero Street
San Francisco, CA 94115
w_reilly@rimacmartin.com
Telephone: (415) 561-8440
Facsimile: (415) 561-8430

MCGUINN, HILLSMAN & PALEFSKY
CLIFF PALEFSKY (State Bar No. 77683)
KEITH EHRMAN (State Bar No. 106985)
535 Pacific Ave.
San Francisco, CA 94133
KAEMHP@aol.com
Telephone: (415) 421-9292
Facsimile: (415) 403-0202

Attorneys for Plaintiff
HUGO SLUIMER

DOLL AMIR & ELEY LLP
GREGORY L. DOLL – CSBN 193205
1888 Century Park East, Suite 1106
Los Angeles, California 90067
Telephone: (310) 557-9100
Facsimile: (310) 557-9101

Attorneys for Defendants
VERITY, INC., and THE VERITY INC.
CHANGE IN CONTROL AND
SEVERANCE BENEFIT PLAN

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

E-FILING

HUGO SLUIMER,

Plaintiff,

v.

VERITY, INC., a corporation, and THE
VERITY INC. CHANGE IN CONTROL AND
SEVERANCE BENEFIT PLAN,

Defendants.

)
) **CASE NO. C 081220 SI**
)
) **JOINT STIPULATION TO EXTEND**
) **THE TIME TO FILE MOTIONS TO BE**
) **HEARD ON NOVEMBER 2, 2010 AND**
) **PROPOSED ORDER**
)
)
)
)
)
)
)
)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

The parties request that the Court permit plaintiff to file any additional motions on or before October 5, 2010, with defendants' oppositions to be filed on or before October 12, 2010, with plaintiff's reply filed on or before October 19, 2010 and the motions heard on November 2, 2010.

Good cause exists for this brief extension because plaintiff's fully briefed Motion to Recover Attorney's Fees, Costs and Interest on Appeal is set for hearing on November 2, 2010. The brief extension of time will permit the parties to attempt to informally resolve all of the issues related to the motions and the Court will not be prejudiced, as the motions will be fully briefed fourteen days before the November 2, 2010 hearing.

SO STIPULATED:

Respectfully submitted,

RIMAC & MARTIN, P.C.

DATED: September 24, 2010

By: /s/ WILLIAM REILLY
WILLIAM REILLY
Attorneys for Plaintiff

DOLL AMIR & ELEY LLP

DATED: September 24, 2010

By: /s/ GREGORY L. DOLL
GREGORY L. DOLL
Attorneys for Defendants
VERITY, INC., and THE VERITY INC.
CHANGE IN CONTROL AND
SEVERANCE BENEFIT PLAN

SO ORDERED:



DATED: _____, 2010

THE HONORABLE SUSAN ILLSTON