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 26 UNITED STATES DISTRICT COURT  
 27 NORTHERN DISTRICT OF CALIFORNIA

28 LOUIS J. VELA,

Plaintiff,

v.

AT&T UMBRELLA BENEFIT PLAN NO. 1,

Defendant.

Case No.: CV 08 1575 MMC

**STIPULATION AND [PROPOSED] ORDER  
 TO CONTINUE FILING DATES RELATED  
 TO PARTIES' MOTIONS FOR SUMMARY  
 JUDGMENT**

Complaint filed: March 21, 2008  
 First Am. Complaint filed: May 14, 2008  
 Second Am. Complaint filed: Oct. 9, 2008

1 Plaintiff Louis Vela (“Plaintiff”) and Defendant AT&T Umbrella Benefit Plan No. 1  
2 (“Defendant”) (collectively the “Parties”), by and through their respective counsel of record,  
3 hereby stipulate as follows:

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5 The Parties previously stipulated to a briefing schedule in support of their  
6 respective Motions for Summary Judgment as reflected in the Court’s Order filed on August  
7 12, 2011 (Docket No. 86). Now, the Parties stipulate and respectfully request the Court to  
8 further continue the Parties’ present deadline for re-noticing their respective Motions for  
9 Summary Judgment and for filing Further Briefing, from November 4, 2011 to December 5,  
10 2011, and continue the Parties’ present deadline for filing Responses to Further Briefing from  
11 November 18, 2011 to December 19, 2011. The Parties also request that the Court allow  
12 each Party up to ten (10) pages for their Responses to Further Briefing (instead of the five  
13 pages currently allowed.)

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15 Good cause exists for the requested continuance of these filing dates, as the re-  
16 opened deposition of Ms. Tonya Warner was taken on October 13, 2011, and the extension of  
17 time allows a reasonable time for the completion of the transcript, as well as the 30-day  
18 statutory review period set forth in the Federal Rules of Civil Procedure, Rule 30(e).

19  
20 The Parties wish to further inform that Court that they have engaged, through  
21 their respective counsel, in discussion about the possibility of conducting further efforts to  
22 informally resolve this dispute. In the event that the Parties agree to such further efforts, the  
23 Parties may approach the Court to request a further continuance of the dates above related to  
24 the filing of the Parties’ Motions for Summary Judgment.

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IT IS SO STIPULATED.

Dated: October 20, 2011

GOLDSTEIN, GELLMAN, MELBOSTAD,  
HARRIS & MCSPARRAN, LLP

By:  /s/ \_\_\_\_\_  
Lee S. Harris  
Attorneys for Plaintiff  
LOUIS J. VELA

Dated: October 20, 2011

MILLER LAW GROUP  
A Professional Corporation

By:  /s/ \_\_\_\_\_  
Katherine L. Kettler  
Attorneys for Defendant  
AT&T UMBRELLA BENEFIT PLAN NO. 1

IT IS SO ORDERED

Dated:  October 24 , 2011

  
HONORABLE MAXINE M. CHESNEY

4817-6513-4348, v. 2