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15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA

18 LOUIS J. VELA,

20 Plaintiff,

21 v.

22 AT&T UMBRELLA BENEFIT PLAN NO. 1,

24 Defendant.

Case No.: CV 08 1575 MMC

**AMENDED
 STIPULATION AND [PROPOSED] ORDER
 TO FURTHER 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:

4
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 October
7 24, 2011 (Docket No. 90). 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 December 5, 2011 to **February 28,**
10 **2012**, and continue the Parties' present deadline for filing their respective Responses to
11 Further Briefing from December 19, 2011 to **March 16, 2012**.

12
13 The Parties request the continuation of the pending dates as they have agreed,
14 through their respective counsel, to engage in further good faith efforts to informally resolve
15 this dispute through private mediation, to be scheduled for a mutually agreeable date.

16
17 In the event that informal resolution is unsuccessful, with regard to the
18 scheduling of any hearing on the Parties' respective Motions for Summary Judgment, counsel
19 for the Parties have met and conferred regarding their respective calendars and availability.
20 Counsel for the Parties respectfully request that the Court schedule any hearing on the
21 Parties' Motions for Summary Judgment for **no earlier than the week of April 16, 2012**.

22
23 The Court has scheduled a further Case Management Conference in this case
24 for January 20, 2012, at 10:30 a.m. (Docket No. 88). In the event that the Court wishes to set
25 a further Case Management Conference in this case, the Parties respectfully request that any
26 further Case Management Conference be set **no earlier than the week of April 16, 2012**.

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IT IS SO STIPULATED.

Dated: November 30, 2011

GOLDSTEIN, GELLMAN, MELBOSTAD,
HARRIS & MCSPARRAN, LLP

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

Dated: November 30, 2011

MILLER LAW GROUP
A Professional Corporation

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

The Parties' deadline for re-noticing their respective Motions for Summary Judgment and for filing Further Briefing in support of those motions, currently set for December 5, 2011 is hereby CONTINUED to February 28, 2012.

The Parties' deadline for filing their respective Responses to Further Briefing, currently set for December 19, 2011 is hereby CONTINUED to March 16, 2012.

The Case Management Conference, currently scheduled for January 20, 2012 at 10:30 a.m., is hereby CONTINUED to June 1 , 2012, at 10:30 a.m.

IT IS SO ORDERED.

Dated: December 2 , 2011


HONORABLE MAXINE M. CHESNEY

4833-8798-3630, v. 1