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5 Attorneys for Defendants
WILSON, SONSINI, GOODRICH & ROSATI
6 LONG TERM DISABILITY PLAN and
THE PRUDENTIAL INSURANCE COMPANY
7 OF AMERICA

8 UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 PAMELA JACKSON, and E. LYNN)
SCHOENMANN, in his capacity as trustee)
of the bankruptcy estate of Pamela Jackson,)

13 Plaintiff,)

14 vs.)

15 WILSON, SONSINI, GOODRICH & ROSATI)
LONG TERM DISABILITY PLAN, and THE)
PRUDENTIAL INSURANCE COMPANY)
16 OF AMERICA,)

17 Defendants.)

CASE NO. CV08-01607 (JSW)

**STIPULATION TO FURTHER
EXTEND TIME FOR DEFENDANTS'
MOTION FOR ATTORNEY'S FEES
AND ~~PROPOSED~~ ORDER**

19 TO THE HONORABLE COURT, ALL PARTIES, AND COUNSEL OF RECORD:

20 Please take notice that counsel for Defendants Wilson, Sonsini, Goodrich & Rosati Long
21 Term Disability Plan and The Prudential Insurance Company of America (collectively referred to
22 as "Defendants") and counsel for Plaintiffs Pamela Jackson and E. Lynn Schoenmann
23 (collectively referred to as "Plaintiffs") met and conferred regarding the time frame for
24 Defendants' Motion for Attorney's Fees, and enter into this stipulation pursuant to L.R. 54-5 and
25 L.R. 6-2, as follows:

26 The parties hereby agree and respectfully request the Court to grant Defendants a further
27 extension to file their Motion for Attorney's Fees and Costs. ("Fee Motion").

28 Pursuant to L.R. 54-5, Defendants are required to file their Fee Motion within 14 days of

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1 the entry of judgment.

2 Summary Judgment in favor of Defendants was entered on August 27, 2010.

3 Pursuant to the parties' stipulation, and this Court's Order dated September 9, 2010,
4 Defendants' Fee Motion must be filed by October 1, 2010.

5 The parties hereby stipulate to extend Defendants' time to file their Fee Motion for an
6 additional two-weeks. Defendants' Fee Motion shall be due on October 15, 2010.

7 Filed herewith, pursuant to L.R. 6-2, is the supporting Declaration of Tad A. Devlin.

8
9 IT IS SO STIPULATED.

10
11 DATED: October __, 2010

12 By: /s/ Richard Johnston
13 Richard Johnston
14 Attorney for Plaintiffs
15 PAMELA JACKSON, and E. LYNN
16 SCHOENMANN, in her capacity as trustee
of the bankruptcy estate of Pamela Jackson

17 DATED: October __, 2010

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18
19
20 By: /s/ Tad A. Devlin
21 Tad A. Devlin
22 Anna F. Ghassab-Shiran
23 Attorneys for Defendants
24 WILSON, SONSINI, GOODRICH &
25 ROSATI LONG TERM DISABILITY PLAN
26 and THE PRUDENTIAL INSURANCE
27 COMPANY OF AMERICA
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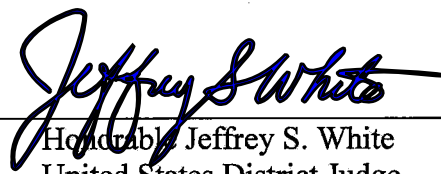
[PROPOSED] ORDER

Pursuant to the parties' Stipulation stated above and good cause appearing, the time frame for Defendants' Motion for Attorney's Fees is modified as follows: Defendants' Motion for Attorney's Fees shall be filed no later than October 15, 2010.

This is the final extension of time.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: October 1, 2010



Honorable Jeffrey S. White
United States District Judge

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