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 13 Carrie Rizzotti

14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO**

17 CARRIE RIZZOTTI

18 Plaintiffs,

19 vs.

20 CENTRAL PACIFIC MORTGAGE
 21 COMPANY LONG TERM
 22 DISABILITY PLAN;
 23 PRUDENTIAL FINANCIAL,

24 Defendants.

Case No.: 3:08-cv-02749 TEH

Action Filed : 06/02/2008

**STIPULATION OF COUNSEL FOR
 AN EXTENSION OF TIME WITHIN
 WHICH DEFENDANT MAY
 RESPOND TO PLAINTIFF’S
 COMPLAINT**

[Local Rule 6-1]

1 Pursuant to Rule 6-1 of the Local Rules of Practice for the United States
2 District Court for the Northern District of California (“Local Rules”), Plaintiff
3 Carrie Rizzotti (“Plaintiff”) and Defendant The Prudential Insurance Company of
4 America (“Defendant”), by and through their respective counsel, hereby stipulate to
5 extend the time within which Defendant may answer or otherwise respond to the
6 Complaint filed by Plaintiff on February 17, 2009 and served by request for waiver
7 of service of summons upon Defendant on December 16, 2008.

8
9 Specifically, Defendant shall have an additional fourteen (14) days from the
10 response date in which to answer or otherwise respond, such that a pleading filed on
11 or before March 3, 2009 shall be deemed timely. Good cause exists for this
12 extension because additional time is needed to gather all relevant plan documents
13 and all matters previously reviewed and considered in connection with Plaintiff’s
14 disability claim (*i.e.*, the “Administrative Record”), to formulate their interim
15 litigation strategy and to prepare their actual responsive pleadings.

16
17 As provided by Local Rule 6-1, this stipulation “will not alter the date of any
18 event or any deadline already fixed by Court order.”

19
20 Dated: February 17, 2009

BARGER & WOLEN LLP



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22 By: /s/ Scott E. Calvert
23 ROBERT J. MCKENNON
24 SCOTT E. CALVERT
25 Attorneys for Defendant
26 The Prudential Insurance Company
27 of America
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Dated: February 17, 2009

THE ERISA LAW GROUP

By: /s/ Thornton Davidson
THORNTON DAVIDSON
Attorneys for Plaintiff
Carrie Rizzotti