

1 Geoffrey V. White (SBN 068012)  
 LAW OFFICE OF GEOFFREY V. WHITE  
 2 351 California Street, Suite 1500  
 San Francisco, CA 94104  
 3 Telephone: (415) 362-5658  
 Facsimile: (415) 362-4115  
 4 Email: gvwhite@sprynet.com

5 Attorneys for Plaintiff

6 Horace W. Green (SBN 115699)  
 GREEN & HUMBERT  
 7 220 Montgomery Street, Suite 1418  
 San Francisco, California 94104  
 8 Telephone: (415) 837-5433  
 Facsimile: (415) 837-0127

9 Attorneys for Defendants

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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

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PATRICIA FORTLAGE,  
 Plaintiff,

vs.

HELLER EHRMAN, LLP; HELLER  
 EHRMAN LONG-TERM DISABILITY  
 PLAN, and UNUM LIFE INSURANCE CO.  
 OF AMERICA  
 Defendants.

Case No. C 08 - 03406 VRW (EMC)

**STIPULATION FOR EXTENSION OF  
 TIME TO FILE OBJECTIONS TO  
 MAGISTRATE JUDGE'S REPORT AND  
 RECOMMENDATIONS AND  
~~PROPOSED~~ ORDER THEREON**

23 Plaintiff Patricia Fortlage and Defendant Heller Ehrman Long Term Disability Plan,  
 24 through their undersigned counsel, hereby stipulate and agree as follows:

25 WHEREAS, Magistrate Judge Edward M. Chen conducted a bench trial in the  
 26 above matter on November 17, 2009, and counsel requested a transcript of the hearing at  
 27 that time;

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Stipulation for Extension of Time to File Objections and Proposed Order - Case No. C 8-3406 VRW (EMC)

1 WHEREAS, Magistrate Judge Chen reviewed the approximately 3,000 pages  
2 comprising the Administrative Record in this case and issued his 53-page Report and  
3 Recommendations re Proposed Findings of Fact and Conclusions of Law on December  
4 18, 2009, such that Plaintiff's Objections are presently due on January 4, 2010;

5 WHEREAS, Plaintiff still has not received a transcript of the proceedings, and the  
6 intervening holidays and the press of other litigation make it virtually impossible to  
7 complete and file the Objections by said date;

8 NOW THEREFORE, it is hereby stipulated by and between the parties, through  
9 their undersigned counsel, that Plaintiff may have to and including January 19, 2010 to file  
10 her Objections and Motion for de novo determination pursuant to Civil Local Rule 72-3,  
11 and Defendant may have 14 days thereafter to file its Responses thereto.

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13 DATE: December 21, 2009

LAW OFFICE OF GEOFFREY V. WHITE

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16 By: /s/ Geoffrey V. White  
GEOFFREY V. WHITE  
Attorney for Plaintiff

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18 DATE: December 21, 2009

GREEN & HUMBERT

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21 By: /s/ Horace W. Green  
HORACE W. GREEN  
Attorneys for Defendants

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23 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

24 DATE: 12/28/2009

25 Honorable V. \_\_\_\_\_

