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12 Attorneys for Plaintiff

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

15 **QUILLER BARNES,**
 16 Plaintiff,
 17 v.
 18 **AT&T PENSION BENEFIT PLAN -**
 19 **NONBARGAINED PROGRAM,**
 20 Defendant.

CASE NO. 08-04058 MHP

**JOINT STIPULATION AND [PROPOSED]
 ORDER EXTENDING DEADLINE FOR
 PLAINTIFF TO FILE SECOND AMENDED
 COMPLAINT AND DEFENDANT TO FILE
 ANSWER**

21
 22 Plaintiff Quiller Barnes and Defendant AT&T Pension Benefit Plan – NonBargained
 23 Program (collectively referred to as the “Parties”) through their respective counsel stipulate as
 24 follows:

25 WHEREAS, on February 22, 2011 Plaintiff filed his Second Amended Class Action
 26 Complaint pursuant to the Court’s instruction at the February 7, 2011 hearing on Plaintiff’s
 27 Motion to Amend the Complaint;

28 WHEREAS, on March 1, 2011, the Court filed its Memorandum & Order Re: Motion to

1 Modify the Court's Class Certification Order; Motion to Amend the Complaint ordering Plaintiff
2 to file his Second Amended Complaint within fourteen days of the date of the Order, or March
3 14, 2011;

4 WHEREAS, Plaintiff intends to revise his Second Amended Class Action Complaint
5 consistent with the Order;

6 WHEREAS, Plaintiff requires additional time to March 18, 2011 to file his revised
7 Second Amended Class Action Complaint;

8 WHEREAS, Defendant does not oppose Plaintiff filing his revised Second Amended
9 Class Action Complaint by no later than March 18, 2011;

10 WHEREAS, Defendant seeks three weeks to file its answer to Plaintiff's Second
11 Amended Class Action Complaint, or until April 8, 2011; and

12 WHEREAS, Plaintiff does not oppose Defendant filing its answer to Plaintiff's Second
13 Amended Class Action Complaint by no later than April 8, 2011.

14 **IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES:**

15 Plaintiff shall file his revised Second Amended Class Action Complaint by no later than
16 **March 18, 2011**. Defendant shall file its answer to Plaintiff's Second Amended Class Action
17 Complaint by no later than **April 8, 2011**.

18
19 Dated: March 8, 2011

SPRINGER-SULLIVAN & ROBERTS LLP

20 By: /S/

21 _____
MICHELLE L. ROBERTS
22 ATTORNEYS FOR PLAINTIFF & CLASS

23 Dated: March 8, 2011

PAUL, HASTINGS, JANOFSKY & WALKER
24 LLP

25 BY: /S/

26 _____
PATRICK W. SHEA
27 ATTORNEYS FOR DEFENDANT

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

2 Plaintiff shall file his revised Second Amended Class Action Complaint by no later than
3 **March 18, 2011.** Defendant shall file its answer to Plaintiff's Second Amended Class Action
4 Complaint by no later than **April 8, 2011.**

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7 Dated: 3/9/2011

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SIGNATURE ATTESTATION

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14

I, Michelle L. Roberts, hereby attest that concurrence in the filing of the document has
been obtained from the other signatory on this document.

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/s/

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MICHELLE L. ROBERTS

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