

1 **COHEN MILSTEIN SELLERS & TOLL PLLC**

R. Joseph Barton (CA State Bar No. 212340)
2 Email: jbarton@cohenmilstein.com
3 Bruce F. Rinaldi (CA State Bar No. 55133)
4 Email: brinaldi@cohenmilstein.com
1100 New York Avenue, N.W.
5 West Tower, STE 500
6 Washington, DC 20005
7 Telephone: (202) 408-4600
8 Facsimile: (202) 408-4699

9 *Attorneys for Plaintiff & the Class*

10 **QUILLER BARNES**

11 **PAUL HASTINGS LLP**

12 Patrick W. Shea (NY State Bar No. 4587176), *Pro Hac Vice*
13 Email: patrickshea@paulhastings.com
14 75 East 55th Street
15 New York, NY 10022
16 Telephone: (212) 318-6000
17 Facsimile: (212) 319-4090

18 *Attorneys for Defendant*

19 **AT&T PENSION BENEFIT PLAN –**
20 **NONBARGAINED PROGRAM**

21 [*Additional counsel listed on next page*]

22 **UNITED STATES DISTRICT COURT**

23 **NORTHERN DISTRICT OF CALIFORNIA**

24 **QUILLER BARNES,**

25 Plaintiff,

26 vs.

27 **AT&T PENSION BENEFIT PLAN –**
28 **NONBARGAINED PROGRAM,**

Defendant.

CASE NO. 08-04058 EMC

**JOINT STIPULATION AND
[PROPOSED] ORDER MODIFYING
BRIEFING SCHEDULE AND
NOTICED HEARING DATE RE:
PLAINTIFF’S MOTION FOR
ATTORNEYS’ FEES AND NON-
TAXABLE COSTS**

1 **SPRINGER-SULLIVAN & ROBERTS LLP**
Michelle L. Roberts (CA State Bar No. 239092)
2 Email: mlr@ssrlawgroup.com
410 – 12th Street, Suite 325
3 Oakland, CA 94607
Telephone: (510) 992-6130
4 Facsimile: (510) 280-7564

5 *Attorneys for Plaintiff & the Class*
6 **QUILLER BARNES**

7 **PAUL HASTINGS LLP**
Stephen H. Harris (CA State Bar No. 184608)
8 Email: stephenharris@paulhastings.com
M'Alyssa C. Mecenias (CA State Bar No. 272075)
9 Email: malysamecenias@paulhastings.com
515 South Flower Street, 25th Floor
10 Los Angeles, CA 90071
Telephone: (213) 683- 6000
11 Facsimile: (213) 627-0705

12 **PAUL HASTINGS LLP**
Regan A.W. Herald (CA State Bar No. 251879)
13 875 15th Street, N.W.
Washington, DC 20005
14 Telephone: (202) 551- 1700
Facsimile: (202) 551-1705
15 Email: reganherald@paulhastings.com

16 *Attorneys for Defendant*
17 **AT&T PENSION BENEFIT PLAN –**
NONBARGAINED PROGRAM

18
19
20
21
22
23
24
25
26
27
28

1 Plaintiff Quiller Barnes and Defendant AT&T Pension Benefit Plan – Nonbargained
2 Program (collectively referred to as the “Parties”), acting through their respective counsel of record,
3 hereby stipulate as follows:

4 WHEREAS, on April 17, 2013, the Court entered final judgment on this case (D.E. #354);

5 WHEREAS, on April 30, 2013, Plaintiff filed PLAINTIFF’S MOTION FOR AWARD OF
6 ATTORNEYS’ FEES AND NON-TAXABLE COSTS (D.E. # 355) (“Motion”) and noticed a
7 hearing for June 6, 2013, such that Defendant’s Opposition brief would be due on May 14, 2013 and
8 Plaintiff’s Reply brief would be due on May 21, 2013;

9 WHEREAS, Plaintiff’s Motion is supported by several declarations and lengthy exhibits and
10 Defendant requests additional time to review these declarations and exhibits; and Plaintiff requests
11 additional time to respond to Defendant’s opposition, including potentially engaging in further
12 discussions with Plaintiff’s counsel to narrow the issues in dispute;

13 WHEREAS, the Parties’ counsel conferred regarding the briefing schedule on Plaintiff’s
14 Motion and agreed to request a change of the hearing date from June 6, 2013 to July 18, 2013 and to
15 extend Defendant’s Opposition deadline and Plaintiff’s Reply deadline as set forth below;

16 IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES:

- 17 1. The deadline for Defendant to file its Opposition to PLAINTIFF’S MOTION FOR
18 AN AWARD OF ATTORNEYS’ FEES AND NON-TAXABLE COSTS (D.E.
19 #355) is extended from May 14, 2013 to June 4, 2013.
- 20 2. The deadline for Plaintiff to file his Reply to Defendant’s Opposition to
21 PLAINTIFF’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND
22 NON-TAXABLE COSTS (D.E. #355) is extended from May 21, 2013 to June 27,
23 2013.

