

1 Michelle L. Roberts - CA STATE BAR NO. 239092
 2 Cassie Springer-Sullivan - CA STATE BAR NO. 221506
 3 SPRINGER-SULLIVAN & ROBERTS LLP
 4 410 - 12th Street, Suite 325
 5 Oakland, CA 94607
 Telephone: (510) 992-6130
 Facsimile: (510) 280-7564
 E-mail: css@ssrlawgroup.com
mlr@ssrlawgroup.com

6 *Attorneys for Plaintiff*

7 SEDGWICK, DETERT, MORAN & ARNOLD LLP
 8 REBECCA A. HULL Bar No. 99802
 9 RYAN L. HARRISON Bar No. 230584
rebecca.hull@sdma.com
ryan.harrison@sdma.com

10 One Market Plaza
 Steuart Tower, 8th Floor
 San Francisco, CA 94105
 Telephone: (415) 781-7900
 Facsimile: (415) 781-2635

12 *Attorneys for Defendant*

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

<p>16 HANNA ZEWDU,</p> <p>17</p> <p style="text-align: center;">18 Plaintiff,</p> <p style="text-align: center;">19 vs.</p> <p style="text-align: center;">20 CITIGROUP LONG TERM DISABILITY PLAN,</p> <p style="text-align: center;">21 Defendant.</p> <p>22</p> <p>23</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Case No. C 08-05770 MMC</p> <p>STIPULATION AND PROPOSED ORDER RE HEARING DATE OF PLAINTIFF'S RULE 52 MOTION FOR JUDGMENT</p>
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24 Plaintiff Hanna Zewdu and Defendant Citigroup Long Term Disability Plan (collectively referred
25 to as the "Parties") through their respective counsel stipulate as follows:

26 WHEREAS, on April 10, 2009, the Court set the hearing date for the Parties's Rule 52 Motion
27 and Cross-Motion for Judgment for March 12, 2009 (Docket Entry #18);

28

1 WHEREAS, on November 4, 2009, Plaintiff filed her Motion to Compel, which was assigned
2 to Judge Maria-Elena James (Docket Entry #24);

3 WHEREAS, on November 9, 2009, Judge James denied Plaintiff's Motion to Compel without
4 prejudice in accordance with the Court's Standing Order Re Discovery (Docket Entry #32);

5 WHEREAS, on December 18, 2009, the Parties filed Joint Letters to Judge James regarding the
6 Parties's discovery dispute;

7 WHEREAS, the current case schedule requires Plaintiff to file her Rule 52 Motion for Judgment
8 on January 29, 2009;

9 WHEREAS, the Parties do not believe that the pending discovery dispute will be resolved prior
10 to January 29, 2009, and seek to extend certain case deadlines to permit sufficient time for the resolution
11 of the discovery issues;

12 WHEREAS, the Parties have sought one extension of time in this matter regarding the ADR
13 deadline;

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

15 The case deadlines are now as follows:

16 Plaintiff's Rule 52 Motion for Judgment: 2/26/09

17 Defendant's Opposition/Cross-motion: 3/12/09

18 Plaintiff's Reply/Opposition: 3/26/09

19 Hearing: 4/9/2010

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21 Dated: December 18, 2009

Respectfully submitted,

22 SPRINGER-SULLIVAN & ROBERTS LLP

23 By: _____
 /s/
 Michelle L. Roberts
 Attorney for Plaintiff

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25 Dated: December 18, 2009

26 SEDGWICK, DETERT, MORAN & ARNOLD
 LLP

27 By: _____
 /s/
 Rebecca Hull
 Attorneys for Defendant

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

2 The case deadlines are now as follows:

3 Plaintiff's Rule 52 Motion for Judgment: ~~2/26/09~~ 2/26/10

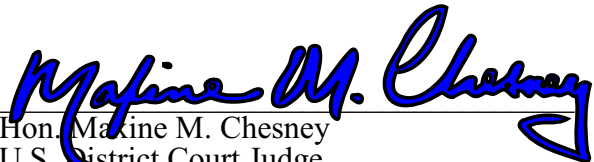
4 Defendant's Opposition/Cross-motion: ~~3/12/09~~ 3/12/10

5 Plaintiff's Reply/Opposition: ~~3/26/09~~ 3/26/10

6 ~~Hearing: 4/9/2010~~ Defendant's Reply: 4/9/10

7 Hearing: 4/30/10

8 Dated: December 21, 2009


Hon. Maxine M. Chesney
U.S. District Court Judge

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