1	Michelle L. Roberts - CA STATE BAR NO. 239092		
2	Cassie Springer-Sullivan - CA STATE BAR N SPRINGER-SULLIVAN & ROBERTS LLP	O. 221506	
3	410 - 12th Street, Suite 325 Oakland, CA 94607		
4	Telephone: (510) 992-6130 Facsimile: (510) 280-7564		
5	E-mail: css@ssrlawgroup.com mlr@ssrlawgroup.com		
6	Attorneys for Plaintiff		
7	SEDGWICK, DETERT, MORAN & ARNOLD LLP REBECCA A. HULL Bar No. 99802		
8	RYAN L. HARRISON Bar No. 230584 rebecca.hull@sdma.com ryan.harrison@sdma.com		
9			
10	One Market Plaza Steuart Tower, 8 th Floor		
11	San Francisco, CA 94105 Telephone: (415) 781-7900		
12	Facsimile: (415) 781-2635		
13	Attorneys for Defendant		
14	UNITED STATES DISTRICT COURT		
15	NORTHERN DISTRICT OF	CALIFORNIA - SAN FRANCISCO	
16	HANNA ZEWDU,	Case No. C 08-05770 MMC	
17			
18	Plaintiff,) vs.)	SECOND STIPULATION AND [PROPOSED] ORDER RE HEARING	
19	}	DATE OF PLAINTIFF'S RULE 52 MOTION FOR JUDGMENT	
20	CITIGROUP LONG TERM DISABILITY) PLAN,		
21	Defendant.		
22			
23))		
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 December 21, 2009, pursuant to the Parties's stipulation, the Court reset the		
27	hearing date for the Parties's Rule 52 Motion and Cross-Motion for Judgment for April 30, 2010 (Docket		
28	Entry #43);		
	2^{ND} Stipulation and [Proposed] Order Re H	1EARING DATE I	

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 discovery dispute is still pending and the Parties await Judge James's ruling on		
8	the Joint Letters;		
9	WHEREAS, the Parties do not believe that the pending discovery dispute will be resolved prior		
10	to February 26, 2010, when Plaintiff must file her Rule 52 Motion for Judgment, and seek to extend		
11	certain case deadlines to permit sufficient time for the resolution of the discovery issues;		
12	WHEREAS, the Parties have sought two extensions of time in this matter, including the ADR		
13	deadline and the hearing date for the Parties's Rule 52 Motion and Cross-Motion for Judgment;		
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: May 21, 2010		
17	Defendant's Opposition/Cross-motion: June 4, 2010		
18	Plaintiff's Reply/Opposition: June 18, 2010		
19	Defendant's Reply: July 2, 2010		
20	Hearing: July 16, 2010		
21			
22	Dated: February 12, 2010 Respectfully submitted,		
23	SPRINGER-SULLIVAN & ROBERTS LLP		
24	By: <u>/s/</u> Michelle L. Roberts		
25	Attorney for Plaintiff		
26	Dated: February 12, 2010SEDGWICK, DETERT, MORAN & ARNOLD LLP		
27	Bv: /s/		
28	By: /s/ Rebecca Hull <i>Attorneys for Defendant</i>		
	2 ND STIPULATION AND [PROPOSED] ORDER RE HEARING DATE 2		

1	PURSUANT TO STIPULATION, IT IS SO ORDERED.		
2	The case deadlines are now as follows:		
3	Plaintiff's Rule 52 Motion for Judgment: May 21, 2010		
4	Defendant's Opposition/Cross-motion: June 4, 2010		
5	Plaintiff's Reply/Opposition: June 18, 2010		
6	Defendant's Reply: July 2, 2010		
7	Hearing: July 16, 2010 July 23, 2010		
8			
9	Dated: February 16, 2010 Maline M. Cherry		
10	Dated: February 16, 2010 Hor Mixine M. Chesney U.S. District Court Judge		
11	0.5 pistict Court sudge		
12			
13			
14			
15			
16			
17			
18			
19 20			
20			
21 22			
22			
23 24			
25			
26			
27			
28			
_0			
	2 ND STIPULATION AND [PROPOSED] ORDER RE HEARING DATE 3		