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16 Attorneys for Defendant
 17 THE PRUDENTIAL INSURANCE
 18 COMPANY OF AMERICA

19 UNITED STATES DISTRICT COURT
 20 NORTHERN DISTRICT OF CALIFORNIA

21 LORRAINE PLACIDO,
 22 Plaintiff,

23 v.

24 THE PRUDENTIAL INSURANCE
 25 COMPANY OF AMERICA;
 26 NORTEL NETWORKS LONG
 TERM DISABILITY PLAN,

27 Defendants.

Case No. CV 09-0668 WHA

**JOINT STIPULATION TO
 CONTINUE HEARING ON
 PLAINTIFF'S MOTION TO LIFT
 STAY AND RELATED BRIEFING
 DEADLINES; ~~PROPOSED~~ ORDER**

DATE: January 7, 2010

TIME: 8:00 a.m.

CTRM: 9

[LOCAL RULES 6-1(B) AND 6-2]

1 TO THE HONORABLE WILLIAM ALSUP AND THE COURT CLERK:

2 1. WHEREAS, Plaintiff, Lorraine Placido, and Defendants, The
3 Prudential Insurance Company of America and Nortel Networks Long Term
4 Disability Plan, by and through their respective counsel of record, hereby request
5 and stipulate that the hearing on Plaintiff's Motion to Lift Stay scheduled for
6 January 7, 2010 at 8:00 a.m. be continued to January 21, 2010, at 8:00 a.m.

7 2. WHEREAS, pursuant to Northern District Local Rule 6-1(b), the
8 parties may stipulate to extend the hearing date, as long as the request is filed no
9 later than 14 days before the scheduled event.

10 3. WHEREAS, this stipulation is submitted 14 days before the hearing
11 date of January 7, 2010, as required by Local Rule 6-1(b).

12 4. WHEREAS, a brief postponement of the hearing date will not impact
13 other case management dates, as the action is currently stayed pursuant to this
14 Court's April 3, 2009 Order.

15 5. WHEREAS, good cause exists for this brief continuance as Plaintiff's
16 counsel and the Plan's counsel have been and will be out of the office on business
17 and due to the holidays, the Plan's counsel has been out of the office due to
18 sickness, and the offices of Nortel will be closed during the holidays.

19 6. WHEREAS, the hearing date on Plaintiff's Motion to Lift the Stay has
20 not been changed or previously extended.

21 7. WHEREAS, the changing of the hearing date affects the deadlines for
22 Defendants to submit their Opposition to Plaintiff's Motion to Lift the Stay, and the
23 deadline for Plaintiff to file her reply, such that Opposition briefs will be due on
24 December 31, 2009, and Plaintiff's Reply brief will be due on January 7, 2010.

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26 ///
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28 ///

1 NOW, THEREFORE, IT IS HEREBY STIPULATED BY AND BETWEEN
2 THE PARTIES THROUGH THEIR UNDERSIGNED ATTORNEYS OF
3 RECORD, THAT:

4 A. The hearing date on Plaintiff's Motion To Lift The Stay shall be
5 continued from January 7, 2010 at 8:00 a.m. to January 21, 2010 at 8:00 a.m.

6 B. Opposition briefs will be due on December 31, 2009, and Plaintiff's
7 Reply brief will be due on January 7, 2010.

8
9 IT IS SO STIPULATED

10
11 Dated: December 17, 2009

FORD & HARRISON LLP

12
13
14 By: /s/ Steven M. Kroll
15 Steven M. Kroll
16 Attorney for Defendant
17 NORTEL NETWORKS LONG
18 TERM DISABILITY PLAN

19 Dated: December 17, 2009.

KANTOR & KANTOR, LLP

20 By: /s/ Glenn R. Kantor
21 Glenn R. Kantor
22 Niamh H. Doherty
23 Attorneys for Plaintiff
24 LORRAINE PLACIDO

25 Dated: December 17, 2009.

BARGER & WOLEN LLP

26 By: /s/ Robert J. McKennon
27 Robert J. McKennon
28 Scott Calvert
Attorneys for Defendant
THE PRUDENTIAL
INSURANCE COMPANY OF
AMERICA

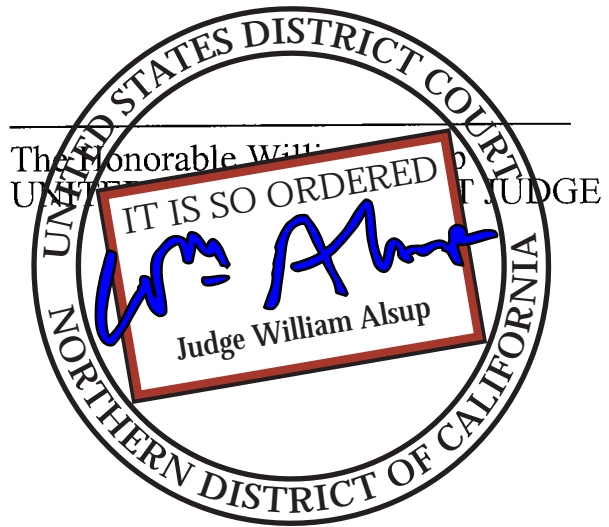
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ORDER

Based on the mutual understanding set forth in the stipulation of the parties to extend the hearing date set for plaintiff's motion to Lift the Stay, and this Court finding good cause shown, the hearing date is now set for January 21, 2010, at 8:00 a.m. The Defendants' Opposition briefs should be filed no later than December 31, 2009, and Plaintiff's Reply Brief should be filed no later than January 7, 2010

IT IS SO ORDERED.

DATED: December 18, 2009.



1 **PROOF OF SERVICE**

2 I, Elsa Lanz, declare:

3 I am a citizen of the United States and employed in Los Angeles County,
4 California. I am over the age of eighteen years and not a party to the within-entitled
5 action. My business address is 350 South Grand Avenue, Suite 2300, Los Angeles,
6 California 90071. On December 17, 2009, I served a copy of the within
7 document(s):

8 **JOINT STIPULATION AND [PROPOSED] ORDER CONTINUING**
9 **HEARING ON PLAINTIFF'S MOTION TO LIFT STAY AND RELATED**
10 **FILING DEADLINES**

- 11 by transmitting via facsimile the document(s) listed above to the fax
12 number(s) set forth below on this date before 5:00 p.m.
- 13 by placing the document(s) listed above in a sealed envelope with
14 postage thereon fully prepaid, in the United States mail at Los Angeles,
15 California addressed as set forth below.
- 16 by placing the document(s) listed above in a sealed _____
17 envelope and affixing a pre-paid air bill, and causing the envelope to
18 be delivered to a _____ agent for delivery.
- 19 by personally delivering the document(s) listed above to the person(s)
20 at the address(es) set forth below.

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PLACIDO*

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*Attorneys for Defendant THE
PRUDENTIAL INSURANCE
COMPANY OF AMERICA*

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I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct. Executed on December 17, 2009, at Los Angeles, California.



Elsa Lanz