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10 Attorneys for Defendant AccentCare Long Term Disability Plan and  
 11 Real Party in Interest Metropolitan Life Insurance Company

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 14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA  
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17 SALIMA ABDULLAH  
 18 Plaintiff,  
 19 v.  
 20 ACCENTCARE LONG TERM  
 21 DISABILITY PLAN,  
 22 Defendant.  
 23 METROPOLITAN LIFE INSURANCE  
 24 COMPANY,  
 25 Real Party in Interest.

CASE NO. C 09-02909 MMC  
 STIPULATION AND ~~PROPOSED~~ ORDER  
 TO CONTINUE DATE FOR FILING JOINT  
 STATEMENT

26 Plaintiff Salima Abdullah (“plaintiff”), defendant AccentCare Long Term Disability  
 27 Plan (“Plan”) and Real Party in Interest Metropolitan Life Insurance Company (“MetLife”)  
 28 (collectively “defendants”), through their respective attorneys of record herein, hereby stipulate

1 and agree, and respectfully request that the Court order, that the date for the parties to file their  
2 joint statement shall be extended one week from November 2, 2012 to November 9, 2012.

3 On September 19, 2012, the Court issued its Order Granting Plaintiff's Motion for  
4 Judgment and Denying Defendant's Cross-Motion for Judgment. (ECF No. 63, hereinafter  
5 "Order".) The Order directed the parties to jointly submit a proposed judgment; or in the  
6 alternative, if the parties could not come to an agreement regarding the amount or form of  
7 judgment, to submit a joint statement setting forth their respective positions. (ECF No. 63,  
8 23:27-22:3.) The parties were ordered to submit a proposed judgment or joint statement no  
9 later than November 2, 2012. (*Id.*)

10 The parties have come to an agreement on some issues but outstanding issues remain to  
11 which the parties do not agree. The parties have been working together to prepare a joint  
12 statement for filing on November 2, 2012. However, defendants' client representative is  
13 located in New York City, and due to Superstorm Sandy earlier this week, communications  
14 with their client representative have been difficult. Defendants' client representative has not  
15 been able to complete the review and approval process with regard to the joint statement. Due  
16 to these very unusual circumstances, the parties agree that good cause exists for the one-week  
17 extension for them to file the joint statement.

18 SO STIPULATED AND AGREED, AND RESPECTFULLY REQUESTED:

19 DATED: November 2, 2012 LAW OFFICES OF LAURENCE F. PADWAY

20  
21 By: /s/ Laurence F. Padway (as authorized 11/2/12)  
22 Laurence F. Padway  
23 Attorney for Plaintiff Salima Abdullah

24 DATED: November 2, 2012 SEDGWICK, DETERT, MORAN & ARNOLD LLP

25 By: /s/ Erin A. Cornell  
26 Rebecca A. Hull  
27 Erin A. Cornell  
28 Attorneys for Defendant AccentCare Long Term  
Disability Plan and Real Party in Interest  
Metropolitan Life Insurance Company

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**ORDER**

Having considered the parties' Stipulation, and good cause appearing, it is hereby ORDERED that the last day for the parties to file their joint statement is continued one week to November 9, 2012.

IT IS SO ORDERED.

DATED: November 1, 2012

  
\_\_\_\_\_  
HONORABLE MAXINE M. CHESNEY  
UNITED STATES DISTRICT JUDGE