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5 THE LINCOLN NATIONAL LIFE INSURANCE  
COMPANY, JEFFERSON PILOT FINANCIAL  
6 INSURANCE COMPANY and CAMINAR, in its  
capacity as Plan Administrator of the Caminar  
7 Comprehensive Health and Welfare Benefit Plan

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12 Attorneys for Plaintiff  
SHARON BARDILL

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15

16 SHARON BARDILL, an individual, )  
17 )  
Plaintiff, )  
18 v. )  
19 THE LINCOLN NATIONAL LIFE )  
INSURANCE COMPANY; JEFFERSON )  
PILOT FINANCIAL INSURANCE )  
20 COMPANY; CAMINAR COMPREHENSIVE )  
HEALTH AND WELFARE BENEFIT PLAN; )  
21 and CAMINAR, in its capacity as Plan )  
Administrator of the Caminar Comprehensive )  
22 Health and Welfare Benefit Plan, )  
23 )  
Defendants. )  
24 )

CASE NO. C09-03025 CRB  
**STIPULATION [AND PROPOSED  
ORDER] TO EXTEND TIME FOR  
DEFENDANTS TO BRING  
MOTION FOR FEES AND COSTS**

25 The parties, Plaintiff SHARON BARDILL and Defendants THE LINCOLN NATIONAL  
26 LIFE INSURANCE COMPANY; JEFFERSON PILOT FINANCIAL INSURANCE  
27 COMPANY; CAMINAR COMPREHENSIVE HEALTH AND WELFARE BENEFIT PLAN;  
28 and CAMINAR, in its capacity as Plan Administrator of the Caminar Comprehensive Health and

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1 Welfare Benefit Plan in this action, through their respective attorneys of record, hereby agree and  
2 stipulate as follows:

3           Whereas the Court entered Order Granting Judgment on March 15, 2011 (Document 64).

4           Whereas Defendants have filed on March 28, 2011 a Request for Final Judgment  
5 Pursuant to FRCP 58 (Document 65).

6           Whereas Plaintiff’s counsel has advised Defendants’ counsel that Plaintiff anticipates  
7 filing a motion for reconsideration and/or an appeal of the Court’s ruling, and Defendants’  
8 counsel has advised that Defendants may seek an award of attorneys’ fees and costs against  
9 Plaintiff.

10           Whereas the parties' counsel have met and conferred regarding the timing of Defendants'  
11 motion for costs and attorneys' fees pursuant to USDC LR 54-1, USDC LR 54-5, the Federal  
12 Rules of Civil Procedure and relevant statutory authority under ERISA, have agreed and stipulate  
13 to extend Defendants' time to file a motion for costs and attorneys' fees until thirty (30) days after  
14 the Court’s action on Defendants’ Request for Final Judgment (Document 65) in this case, or  
15 until a further date by stipulation and Court order, or otherwise as the Court may order.

16           Respectfully submitted.

17           IT IS SO STIPULATED.

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19 DATED: March 29, 2011

GORDON & REES LLP

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By \_\_\_\_\_/s/ Tad A. Devlin

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Tad A. Devlin  
Attorneys for Defendants  
THE LINCOLN NATIONAL LIFE  
INSURANCE COMPANY,  
JEFFERSON PILOT FINANCIAL  
INSURANCE COMPANY and  
CAMINAR, in its capacity as Plan  
Administrator of the Caminar  
Comprehensive Health and Welfare  
Benefit Plan

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1 DATED: March 29, 2011

JULIAN M. BAUM & ASSOCIATES

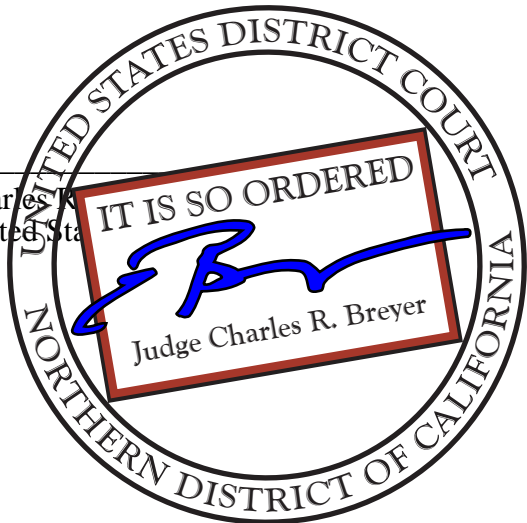
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4 By           /s/ Julian M. Baum            
5 Julian M. Baum  
6 Attorneys for Plaintiff  
7 SHARON BARDILL

8 **PROPOSED ORDER**

9 Based on the above stipulation, the Court extends the time for Defendants to bring any  
10 Motion for Fees and Costs until thirty (30) days after the Court's action on Defendants' Request  
11 for Final Judgment (Document 65) in this case, or until a further date by stipulation and Court  
12 order, or otherwise as the Court may order.

13 IT IS SO ORDERED.

14 Date: March 31, 2011

15 Charles R. Breyer  
16 United States District Judge  
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