



1           **IT IS HEREBY STIPULATED**, pursuant to Local Rule 6-2, by and between Plaintiff  
2 Chad Bilbrey and Defendants Reliance Standard Insurance Company (“Reliance Standard”),  
3 Matrix Absence Management, Inc. (“Matrix”), Group Welfare Benefit Plan and LAM Research  
4 Corporation, through their attorneys of record, that the time for plaintiff to file his Second  
5 Amended Complaint, currently set for June 25, 2010, shall be continued to July 26, 2010.

6           Further, if this stipulation is granted, the parties stipulate and request that the Status  
7 Conference, which was previously continued by the Court from May 17, 2010 to July 26, 2010, be  
8 continued to a date after July 26, 2010, convenient for the calendars of the parties and the Court.

9           As set forth in the attached Declaration, the parties are currently engaged in serious and  
10 significant settlement discussion. The parties are optimistic that these negotiations will result in  
11 the complete resolution of this matter before a new Amended Complaint needs to be filed and  
12 another Status Conference needs to be held.

13           Pursuant to Local Rule 6-2, the declaration of Abraham N. Goldman in support of this  
14 motion is filed contemporaneously with this stipulation and order.

15 Dated: June 17, 2010

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

16           By: /s/ Dennis J. Rhodes  
17 ADRIENNE C. PUBLICOVER  
18 DENNIS J. RHODES, Attorneys for Defendants  
19 RELIANCE STANDARD INSURANCE CO.  
and MATRIX ABSENCE MANAGEMENT, INC.  
and GROUP WELFARE BENEFIT PLAN

20 Dated: June 17, 2010

ABRAHAM GOLDMAN & ASSOCIATES LTD.  
21 Per: /s/ Abraham Goldman  
ABRAHAM GOLDMAN, Attorney for Plaintiff  
22 CHAD BILBREY

23 Dated: June 17, 2010

KRAFCHICK LAW FIRM.  
24 Per: /s/ Steven P. Krafchick  
STEVEN P. KRAFCHICK, Attorney for Plaintiff  
25 CHAD BILBREY

**ORDER**

26           Pursuant to stipulation of the parties, the time for plaintiff to file his Second Amended  
27 Complaint is extended from June 25, 2010 to July 26, 2010. The Status Conference reset from  
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1 May 17, 2010 to July 26, 2010, is hereby reset to August 30, 2010, at 3:00 p.m.  
2 Status report to be filed one week prior to the Status Conference.

3 **IT IS SO ORDERED.**

4 Dated: June 21, 2010

5 By: \_\_\_\_\_

6 HONORABLE MARILYN H. PATEL  
7 UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA



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