

1 ADRIENNE C. PUBLICOVER (SBN: 161432)

Email: adrienne.publicover@wilsonelser.com

2 CHARAN M. HIGBEE (SBN: 148293)

Email: charan.higbee@wilsonelser.com

3 **WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP**

4 525 Market Street – 17th Floor
San Francisco, California 94105-2725
5 Telephone: (415) 433-0990
6 Facsimile: (415) 434-1370

7 Attorneys for Defendants,

**THE PERMANENTE MEDICAL GROUP, INC.
in its capacity as Plan Administrator and THE PERMANENTE
8 MEDICAL GROUP, INC. LONG TERM DISABILITY
9 PLAN FOR PHYSICIANS**

10 JULIAN M. BAUM (SBN 130892)

Email: JMB@JMBLawGroup.com

11 LISA A. LAWRENCE (SBN 132310)

Email: LAL@JMBLawGroup.com

12 **JULIAN M. BAUM & ASSOCIATES**

9 Tenaya Lane
13 Novato, California 94947
14 Telephone: (415) 963-4424
Facsimile: (888) 452-3849

15 Attorney for Plaintiff,

THOMAS A. GONDA, JR., M.D.

16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA**

18
19 THOMAS A. GONDA, JR., M.D.,
20 an individual,

Case No.: 3:11-cv-01363-SC

21 vs.

**STIPULATION TO EXTEND TIME TO
ANSWER OR OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT AND
[PROPOSED] ORDER**

22
23 THE PERMANENTE MEDICAL GROUP,
INC. in its capacity as Plan Administrator; THE
24 PERMANENTE MEDICAL GROUP, INC.
LONG TERM DISABILITY PLAN FOR
25 PHYSICIANS,

Action Filed: March 22, 2011

1 **IT IS HEREBY STIPULATED**, pursuant to Local Rules 6-1 and 6-2, by and between
2 plaintiff Thomas A. Gonda, Jr., M.D. (“plaintiff”) and defendants The Permanente Medical Group,
3 Inc. in its capacity as Plan Administrator and The Permanente Medical Group, Inc. Long Term
4 Disability Plan for Physicians (“defendants”), through their attorneys of record, as follows:

5 1. Defendants were served with the Summons and Complaint on or about May 6, 2011
6 and their responses to the Complaint currently are due on or before May 27, 2011;

7 2. Plaintiff and defendants have agreed that defendants may have an extension to and
8 including June 27, 2011 to answer or otherwise respond to the Complaint; and

9 3. This extension of time to respond to the Complaint does not alter the date of any
10 event or any deadline already fixed by Court Order, and no previous stipulation to extend the time
11 to answer or otherwise respond to the Complaint has been filed in this action.

12
13 Dated: May 25, 2011

WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP

14
15 By: /s/ Charan M. Higbee
16 ADRIENNE C. PUBLICOVER
17 CHARAN M. HIGBEE
18 Attorneys for Defendants,
19 THE PERMANENTE MEDICAL GROUP,
INC. in its capacity as Plan Administrator and
THE PERMANENTE MEDICAL GROUP,
INC. LONG TERM DISABILITY PLAN FOR
PHYSICIANS

20 Date: May 26, 2011

JULIAN M. BAUM & ASSOCIATES

21
22 By: /s/ Julian M. Baum
23 JULIAN M. BAUM
24 LISA A. LAWRENCE
25 Attorneys for Plaintiff
26 THOMAS A. GONDA, JR., M.D.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED:

Defendants The Permanente Medical Group, Inc. in its capacity as Plan Administrator and The Permanente Medical Group, Inc. Long Term Disability Plan for Physicians have an extension to and including June 27, 2011 to answer or otherwise respond to plaintiff's Complaint in this action.

Date: May 27, 2011

By:



CERTIFICATE OF SERVICE

Thomas A. Gonda, Jr., M.D v. The Permanente Medical Group, Inc. in its capacity as Plan Administrator, et al.
U.S.D.C., Northern District of California, Case No.: 3:11-cv-01363-SC

At the time of service I was over 18 years of age and not a party to this action. I am employed by WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP. My business address is 525 Market Street, 17th Floor, San Francisco, California 94105. My business telephone number is (415) 433-0990; my business fax number is (415) 434-1370. On this date I served the following document(s):

STIPULATION TO EXTEND TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT AND [PROPOSED] ORDER

on the person or persons listed below, through their respective attorneys of record in this action, by placing true copies thereof in sealed envelopes or packages addressed as shown below by the following means of service:

: **By Electronic Service.** Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at the electronic notification addresses listed below.

Julian M. Baum
Lisa A. Lawrence
JULIAN M. BAUM & ASSOCIATES
9 Tenaya Lane
Novato, California 94947
Telephone: (415) 963-4424
Facsimile: (888) 452-3849
Attorney for Plaintiff, Thomas A. Gonda, Jr., M.D.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

EXECUTED on May 26, 2011, at San Francisco, California.


Stacey Muller