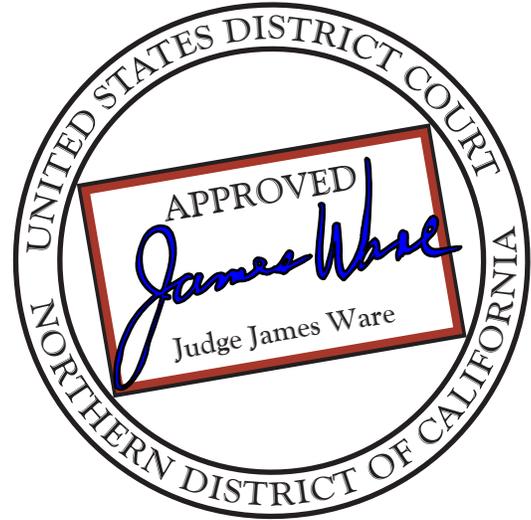


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 14 Cross Life and Health Insurance Co. and
 15 Lawrence Livermore National Security
 16 Health and Welfare Benefit Plan for
 17 Employees

18 UNITED STATES DISTRICT COURT
 19 FOR THE NORTHERN DISTRICT OF CALIFORNIA

20 DENISE ANDERSON,
 21
 22 Plaintiff,

23 vs.

24 LAWRENCE LIVERMORE NATIONAL
 25 SECURITY HEALTH AND WELFARE
 26 BENEFIT PLAN FOR EMPLOYEES;
 27 ANTHEM BLUE CROSS LIFE AND
 28 HEALTH INSURANCE COMPANY,
 Defendants.

Case No.: 3:11-cv-03865 JW

**JOINT STIPULATION AND
 [PROPOSED] ORDER TO
 EXTEND TIME TO FILE
 ADMINISTRATIVE RECORD**

REED SMITH LLP
 A limited liability partnership formed in the State of Delaware

1 Plaintiff Denise Anderson (“Plaintiff”), Defendant Anthem Blue Cross Life and
2 Health Insurance Company (“ABCLH”), and Defendant Lawrence Livermore
3 National Security Health and Welfare Benefit Plan for Employees (“Lawrence
4 Livermore”) hereby submit, through the undersigned, the following Joint Stipulation
5 and [Proposed] Order To Extend Time to File Administrative Record:
6

7 WHEREAS on August 5, 2011, Plaintiff filed her ERISA complaint in the
8 above-titled action in the United States District Court Northern District of California;
9

10 WHEREAS the Court issued a Scheduling Order setting the Deadline for Filing
11 Administrative Record as March 19, 2012;
12

13 WHEREAS the Parties attended a mediation with Ralph Williams of ADR
14 Services and believe they are very close to potentially resolving their dispute and
15 agreeing to a settlement;
16

17 WHEREAS the Administrative Record contains confidential medical records
18 protected by the Health Insurance Portability and Accountability Act of 1996
19 (HIPAA) and the Parties wish to avoid submitting the records, if possible, given the
20 potential imminent resolution;
21

22 WHEREAS the Parties wish to continue the Deadline for Filing Administrative
23 Record by three weeks to April 9, 2012 to allow the Parties time to potentially reach a
24 settlement agreement and dismiss the action; AND
25

26 WHEREAS this change to the Deadline for Filing Administrative Record will
27 not alter the date of any event or any deadline already fixed by Court order;
28

1 IT IS THEREFORE STIPULATED AND AGREED by and between Plaintiff,
2 ABCLH, and Lawrence Livermore through the undersigned, to extend the Deadline
3 for Filing Administrative Record to April 9, 2012.

4
5 DATED: March 16, 2012.

LAW OFFICES OF RUSSELL G. PETTI

7 By /s/ Russell G. Petti
8 Russell G. Petti
9 Attorneys for Plaintiff Denise Anderson

10 DATED: March 16, 2012.

REED SMITH LLP

11 By /s/ Eric C. Schaffer
12 Kenneth N. Smersfelt
13 Eric C. Schaffer
14 Attorneys for Defendants Anthem Blue
15 Cross Life and Health Insurance Co. and
16 Lawrence Livermore National Security
17 Health and Welfare Benefit Plan for
18 Employees

16 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

17 DATE: March 27, 2012

18 
19 Honorable James Ware