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7 Attorneys for Defendant
 8 MONUMENTAL LIFE INSURANCE COMPANY

9
 10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

12
 13 JOSEPH HADDAD,
 14 Plaintiff,
 15 v.
 16 MONUMENTAL LIFE INSURANCE
 17 COMPANY,
 18 Defendant.

Case No. CV 13 1636 JSC

**STIPULATION AND [PROPOSED] ORDER
 TO FILE AN AMENDED COMPLAINT
 AND EXTEND DEFENDANT’S TIME TO
 RESPOND**

19
 20 Plaintiff Joseph Haddad (“Plaintiff”) and Defendant Monumental Life Insurance Company
 21 (“Defendant”), through their respective counsel, stipulate as follows:

22 WHEREAS Plaintiff, a former employee of Defendant, filed a Complaint against Defendant
 23 in this Court on April 10, 2013;

24 WHEREAS the parties have conferred regarding the causes of action alleged in Plaintiff’s
 25 complaint in an effort to avoid unnecessary motion practice;

26 WHEREAS Plaintiff wishes to file an Amended Complaint;

1 WHEREAS the parties agree that it would be inefficient for the parties and the Court for
2 Defendant to respond to the initial Complaint, which response is currently due May 9, 2013, and
3 have Plaintiff file an Amended Complaint mere days later.

4 IT IS HEREBY STIPULATED AND AGREED, by and through the parties' respective
5 counsel of record, as follows:

- 6 1. Defendant's time to respond to Plaintiff's Complaint is extended to May 17, 2013;
- 7 2. Plaintiff may file an Amended Complaint on or before May 10, 2013;
- 8 3. In the event Plaintiff files an Amended Complaint, Defendant shall have until
9 May 31, 2013, to answer or otherwise respond to Plaintiff's Amended Complaint.

10 IT IS SO STIPULATED.

11
12 Dated: May 1, 2013

13 /s/ Kurt R. Bockes
14 KURT R. BOCKES
15 LITTLER MENDELSON
16 A Professional Corporation
17 Attorneys for Defendant
18 MONUMENTAL LIFE INSURANCE COMPANY

19 Dated: May 1, 2013

20 /s/ Frear Stephen Schmid
21 FREAR STEPHEN SCHMID
22 LAW OFFICES OF GARY A. ANGEL
23 Attorneys for Plaintiff
24 JOSEPH HADDAD

25 PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING IT IS SO ORDERED:

26 Dated: 5/2, 2013

27 U.S. DISTRICT



28 Firmwide: 119795452.3 071786.1001