

1 LAW OFFICES OF LAURENCE F. PADWAY
 Laurence F. Padway (SBN 89314)
 2 1516 Oak Street, Suite 109
 Alameda, CA 94501
 3 Tel: 510.814.6100
 Fax: 510.814.0650
 4 *Attorneys for Plaintiff Dave Nagy*

5 BURKE, WILLIAMS & SORENSEN, LLP
 Michael B. Bernacchi (SBN 163657)
 6 E-mail: mbernacchi@bwslaw.com
 444 South Flower Street, Suite 2400
 7 Los Angeles, CA 90071-2953
 Tel: 213.236.0600
 8 Fax: 213.236.2700
Attorneys for Defendants
 9 *Group Long Term Disability Plan for*
Employees of Oracle America, Inc. and
 10 *Hartford Life and Accident Insurance Company*

11
 12 **UNITED STATES DISTRICT COURT**
 13 **NORTHERN DISTRICT OF CALIFORNIA**
 14 **SAN FRANCISCO DIVISION**

15
 16 DAVE NAGY,
 17 Plaintiff,
 18 v.
 19 GROUP LONG TERM
 20 DISABILITY PLAN FOR
 EMPLOYEES OF ORACLE
 21 AMERICA, INC., and HARTFORD
 LIFE AND ACCIDENT
 INSURANCE COMPANY,
 22 Defendants.
 23

Case No. 14-CV-00038-HSG

**STIPULATION AND ORDER FOR
 EXTENSION TO SUBMIT A
 PROPOSED JUDGMENT RE
 DISABILITY BENEFITS AND
 PREJUDGMENT INTEREST**

Honorable Haywood S. Gilliam, Jr.

24
 25 Plaintiff Dave Nagy (“Plaintiff” or “Nagy”) and Defendants Group Long
 26 Term Disability Plan for Employees of Oracle America, Inc. (“the Plan”) and
 27 Hartford Life and Accident Insurance Company (“Hartford”) (collectively
 28 ///

1 “Defendants”), hereby stipulate for an extension of ten (10) days to submit a
2 proposed judgment consistent with the Court’s April 22, 2016 Order.

3 WHEREAS on April 22, 2016 this Court issued an interlocutory order
4 finding Nagy was entitled to disability benefits between September 13, 2011 and
5 January 16, 2013.

6 WHEREAS this Court also ordered the parties to meet and confer over the
7 amount of disability benefits and prejudgment interest owed to Nagy based on the
8 findings and conclusions of the Court’s order and submit a proposed judgment
9 within thirty (30) days.

10 WHEREAS, the parties have met and conferred over the disability benefits
11 awarded under the Court’s order and have essentially reached an agreement on that
12 amount. However, the parties have a disagreement over the amount of pre-
13 judgment interest that should be awarded and thus jointly request that this Court
14 allow a brief ten (10) day extension to submit the proposed judgment to see if they
15 can resolve the interest issue.

16 THE PARTIES THEREFORE STIPULATE AND REQUEST that they be
17 given a ten (10) day extension to submit the proposed judgment to the Court by no
18 later than **June 2, 2016**.

19
20 Dated: May 23, 2016

Law Offices of Laurence F. Padway

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22 By: */s/ Laurence F. Padway*
[As authorized on May 23, 2016]

23 Laurence F. Padway
Attorneys for Plaintiff Dave Nagy

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Dated: May 23, 2016

Burke, Williams & Sorensen, LLP

By: /s/ Michael B. Bernacchi
Michael B. Bernacchi
Attorneys for Defendants Group Long
Term Disability Plan for Employees of
Oracle America, Inc. and Hartford Life
and Accident Insurance Company

ORDER

Pursuant to the parties' stipulation, and good cause appearing, IT IS
HEREBY ORDERED that the proposed judgment be filed with the Court no later
than **June 2, 2016**.

Dated: 5/24/2016


Hon. Haywood S. Gilliam, Jr.
United States District Judge