

1 Anna Maria Martin (Bar No. 154279)
 amartin@mmhllp.com
 2 Grant Ingram (Bar No. 242785)
 gingham@mmhllp.com
 3 MESERVE, MUMPER & HUGHES LLP
 800 Wilshire Boulevard, Suite 500
 4 Los Angeles, California 90017-2611
 Telephone: (213) 620-0300
 5 Facsimile: (213) 625-1930

6 Attorneys for Defendants
 7 LIFE INSURANCE COMPANY OF NORTH AMERICA
 and METROPCSWIRELESS, INC. EMPLOYEE
 8 WELFARE BENEFIT PLAN

9 Laurence F. Padway (Bar No. 83914)
 10 LAW OFFICES OF LAURENCE F. PADWAY
 1516 Oak Street, Suite 109
 11 Alameda, CA 94501
 Tel: 510.814.6100
 12 Fax: 510.814.0650

13 David J. Linden
 14 P.O. Box 5780
 Napa, CA 94581
 15 Tel: 707.252.7007
 16 Fax: 707.252.7883

17 Attorneys for Plaintiff
 SONJA K. RYGG

18 **IN THE UNITED STATES DISTRICT COURT**
 19 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 20 **SAN FRANCISCO DIVISION**

21 SONJA K. RYGG,) CASE NO. 3:17-cv-06891-JST
 22)
 23 Plaintiff,) **STIPULATION TO CONTINUE**
) **BRIEFING AND HEARING**
 24 vs.) **SCHEDULE; and ~~PROPOSED~~**
) **ORDER**
 25 METROPCS WIRELESS, INC.)
 EMPLOYEE WELFARE BENEFIT PLAN,) **Date: November 15, 2018**

27 STIPULATION TO CONTINUE BRIEFING AND HEARING SCHEDULE & ~~PROPOSED~~
 ORDER

1 and LIFE INSURANCE COMPANY OF) **Time: 2:00 p.m.**
NORTH AMERICA,)
2)
Defendants.)
3

4
5 Whereas the following briefing schedule was set by the Court on March 7, 2018: and,

6 Plaintiff's opening brief: September 10, 2018
7 Defendant's opening brief: October 1, 2018
8 Plaintiff's response: October 15, 2018
9 Defendant's response: October 29, 2018
10 Hearing: November 15, 2018 at 2:00 p.m.

11
12 Whereas, counsel for plaintiff requests an approximately four week continuance to
13 October 8, 2018, due to the fact that he is the primary lawyer for Plaintiff Sonja Rygg. He is a
14 solo practitioner with one full time paralegal, and a part time assistant. He has been out ill for
15 much of August, 2018, in part due to right knee surgery. In addition, his paralegal was
16 hospitalized on an urgent basis and missed substantial time from work during August;

17
18 Now, therefore, the parties respectfully request that the filing and hearing deadlines be
19 continued as follows:

20 Plaintiff's opening brief: October 8, 2018
21 Defendant's opening brief: October 26, 2018
22 Plaintiff's response: November 12, 2018
23 Defendant's response: November 30, 2018
24 Hearing: December 17, 2018 at 2:00 p.m.

MESERVE, MUMPER & HUGHES LLP

DATED: September 11, 2018

By: /s/ Anna M. Martin
ANNA M. MARTIN
Attorneys for Defendants
LIFE INSURANCE COMPANY OF NORTH
AMERICA and METROPCSWIRELESS, INC.
EMPLOYEE WELFARE BENEFIT PLAN

LAW OFFICES OF LAURENCE F. PADWAY

DATED: September 11, 2018

By: /s/ Laurence F. Padway
LAURENCE F. PADWAY
Attorneys for Plaintiff
SONJA K. RYGG

ATTESTATION PURSUANT TO GENERAL ORDER 45

I, Laurence F. Padway, attest that concurrence in the filing of this document has been obtained from any signatories indicated by a “conformed” signature (/s/) within this e-filed document. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: September 11, 2018

LAW OFFICES OF LAURENCE F. PADWAY

By: /s/Laurence F. Padway
LAURENCE F. PADWAY
Attorneys for Plaintiff
SONJA K. RYGG

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

~~PROPOSED~~ ORDER

Pursuant to the stipulation of the parties, it is so ordered. The briefing and hearing schedule set forth above is hereby adopted, except that Plaintiff's opening brief shall be due on October 9, 2018; Plaintiff's response brief shall be due on November 13, 2018; and the hearing shall be held on December 20, 2018.

IT IS SO ORDERED.

Dated: September 13, 2018



UNITED STATES DISTRICT JUDGE

Jon S. Tigar