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 10 THE PERMANENTE MEDICAL GROUP
 11 LONG TERM DISABILITY PLAN

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

11 LAWRENCE SIROTT,
 12 Plaintiff,
 13 vs.
 14 THE PERMANENTE MEDICAL GROUP
 15 LONG TERM DISABILITY PLAN,
 16 Defendant.

) Case No.: C 07-04870 PJH
)
) **JOINT STIPULATION AND REQUEST**
) **FOR A CONTINUANCE OF THE CASE**
) **MANAGEMENT CONFERENCE AND**
) **[PROPOSED] ORDER**

17
 18 The parties in the above-captioned matter, Lawrence Sirott, M.D., through his counsel of
 19 record, Daniel Feinberg, Lewis, Feinberg, Lee, Renaker & Jackson, P.C., and defendant The
 20 Kaiser Permanente Medical Group Long Term Disability Plan, through its counsel of record, Sean
 21 P. Nalty, Wilson, Elser, Moskowitz, Edelman & Dicker, hereby jointly request an additional one-
 22 month continuance of the Case Management Conference in this matter and the dates associated
 23 with the conference.

24 Currently, the Case Management Conference Statement is due January 31, 2008 and the
 25 initial Case Management Conference (“CMC”) in this matter is set for February 7, 2008.

26 The parties request this continuance in order to continue to pursue settlement discussions
 27 in this matter. The Parties have worked diligently over the last month and have made significant
 28 progress. The parties need additional time to complete these discussions. The parties agree that it

1 is important to these settlement efforts that the parties avoid incurring additional legal fees until
2 such time as these discussions are exhausted, including the fees generated in preparing for the
3 CMC and attending the CMC. The parties represent that this will be the last request to continue
4 this matter based on these settlement discussions.

5 Accordingly, based on the explanation above, the parties hereby stipulate that the Case
6 Management Conference in this matter, and the various dates associated with the conference, may
7 be continued for 28 days.

8 IT IS SO STIPULATED.

9 Dated: January 30, 2008

WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP

11 By: Sean Nalty

SEAN P. NALTY
Attorneys for Defendant
THE PERMANENTE MEDICAL GROUP LONG
TERM DISABILITY PLAN

14 Dated: January 30, 2008

LEWIS, FEINBERG, LEE, RENAKER & JACKSON, P.C.

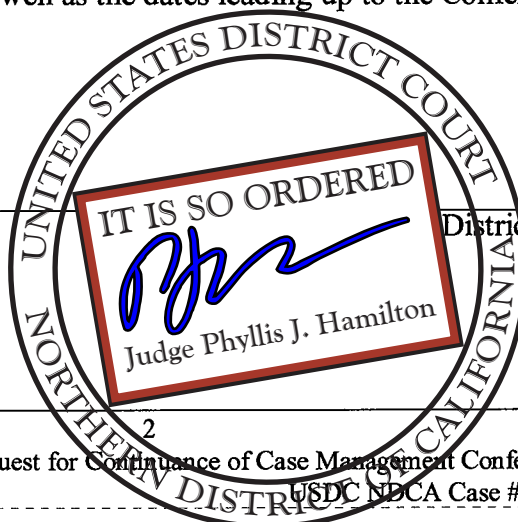
17 By: Daniel Feinberg

DANIEL FEINBERG
Attorneys for Plaintiff
LAWRENCE SIROTT

20 Based on the stipulation of the parties, and good cause appearing therefore, the Court will
21 issue a new initial scheduling order continuing the Case Management Conference in this matter
22 for 28 days, i.e. to March 6, 2008, as well as the dates leading up to the Conference.

23 IT IS SO ORDERED.

24 Dated: 2/1/08



District Court