R	а	m	0	SV.	В	а	n	k		o f	A	m	е	r	i	С	а	De	đ
			1			1.01			DNOI	DIID									
			1	SEDGWICK, DE REBECCA A. HU	JLL B	ar No	o. 998	802		D LLP									
			2	MICHELLE Y. N One Market Plaza	L		ar N	o. 21:	5294										
			3	Steuart Tower, 8t San Francisco, Ca	lifornia	a 941	05												
			4	Telephone: (415) Facsimile: (415)															
			5	Attorneys for Def															
			6	Metropolitan Life Bank of America	Long T	erm	Disa	bility	Benef										
			7	(erroneously suec	as Bar	ık of	Ame	erica l	Long T	Ferm Dis	sability	Plan)							
			8			τ	JNIT	ED S	STATE	ES DIST	RICT (	COUR	RТ						
			9			NO	RTH	IERN	I DIST	RICT O	F CAL	IFOR	NIA						
			10																
			11	LENA MONZON	RAM	OS,				CAS	E NO. (	CV 08	8-013	75 P.	ΙH				
			12	Plainti	ff,						ULAT								
			13	V.							DER TO				VIE	101	FILE		
			14	BANK OF AME	RICA;				-										
			15	METROPOLITA COMPANY; BA	NK OF	AMI	ERIC	CA	1										
			16	LONG TERM DI		ſΓΥ	PLA	N,											
			17	Defen	lants.														
			18																
			19	Defenda	nts Met	ropol	litan	Life	Insura	nce Con	npany (	"MetI	Life")	and	Ban	k of	Ameri	ca	
			20	Long Term Disab	ility Be	enefit	s Pla	ın ("d	lefenda	ants" her	rein) an	d plai	ntiff	Lena	Mo	nzon	Ramo	s, by	
			21	and through their	attorne	ys of	reco	ord, h	ereby a	agree an	d stipu	late as	follo	ows:					
			22	1. Or	July 3	1, 20	08, tl	his C	ourt he	eld a Ca	se Man	ageme	ent Co	onfei	ence	e in v	vhich t	he	
			23	Court ordered that	t the pa	rties	woul	ld ha	ve sixt	y (60) d	ays to f	file a r	notio	n to	comj	pel d	iscove	ry,	
			24	that is, on or befo	re Sept	embe	er 29,	2008	8;										
			25	2. Fo	llowing	g disc	ussic	ons be	etweer	n plaintif	ff and d	efend	ants r	egar	ding	disc	overy		
			26	issues, plaintiff se	rved he	er firs	st set	of in	terrog	atories a	nd her	first s	et of	requ	ests f	for p	roduct	ion	
			27	of documents on	MetLife	e, on	Aug	ust 29	9, 2008	8. MetL	ife's re	spons	es to	plair	tiff	s dis	covery		
			28	currently are due	Septem	iber 3	80, 20	008;											
	SF/153	39141v1								-1-							08-0137	75 PJH	
				STIPULATIC	N AND	[PRO]	POSE	D] O	RDER T	TO EXTE	ND TIM	E TO I	FILE N	AOTĪ	ON T	0 CC ]		с	k
																	Ŭ	-	

1	3. The parties have stipulated that plaintiff may have an extension, until October 28,											
2	2008, in which to file any motions to compel discovery in this action, and request that the Court											
3	so order.											
4	IT IS SO STIPULATED.											
5	DATED: September 30, 2008 SEDGWICK, DETERT, MORAN & ARNOLD LLP											
6												
7												
8	By: <u>/s/ Michelle Y. McIsaac</u> Rebecca A. Hull											
9	Michelle Y. McIsaac Attorneys for Defendants											
10	Metropolitan Life Insurance Company and Bank of America Long Term Disability Benefits Plan											
11												
12	DATED: September, 2008 THE LAW OFFICE OF JOSEPH CREITZ, P.C.											
13												
14												
15	By: Joseph Creitz											
16	Attorney for Plaintiff Lena Monzon Ramos											
17	<u>ORDER</u>											
18	Upon the stipulation of the parties, IT IS SO ORDERED.											
19	DATED: 9/30/08											
20												
21	UNITED STATES DISTRICT COUR NORTHERN DISTRICT IT IS SO ORDERED											
22												
23	Z Judge Phyllis J. Hamilton											
24												
25	FERN DISTRICT OF CT											
26	OISTRIC <sup>1</sup>											
27												
28												
SF/1539141v1	-2- CASE NO. CV 08-01375 PJH STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO FILE MOTION TO COMPEL											
	STILULATION AND [FROFUSED] ORDER TO EATEND TIME TO FILE MOTION TO COMPEL											