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10 Metropolitan Life Insurance Company and
11 Bank of America Long Term Disability Benefits Plan
12 (erroneously sued as Bank of America Long Term Disability Plan)

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA

15 LENA MONZON RAMOS,

16 Plaintiff,

17 v.

18 BANK OF AMERICA;
19 METROPOLITAN LIFE INSURANCE
20 COMPANY; BANK OF AMERICA
21 LONG TERM DISABILITY PLAN,

22 Defendants.

CASE NO. CV 08-01375 PJH

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO FILE
MOTION TO COMPEL**

23 Defendants Metropolitan Life Insurance Company (“MetLife”) and Bank of America
24 Long Term Disability Benefits Plan (“defendants” herein) and plaintiff Lena Monzon Ramos, by
25 and through their attorneys of record, hereby agree and stipulate as follows:

26 1. On July 31, 2008, this Court held a Case Management Conference in which the
27 Court ordered that the parties would have sixty (60) days to file a motion to compel discovery,
28 that is, on or before September 29, 2008;

29 2. Following discussions between plaintiff and defendants regarding discovery
30 issues, plaintiff served her first set of interrogatories and her first set of requests for production
31 of documents on MetLife, on August 29, 2008. MetLife’s responses to plaintiff’s discovery
32 currently are due September 30, 2008;

