

1 SEDGWICK, DETERT, MORAN & ARNOLD LLP
 REBECCA A. HULL Bar No. 99802
 2 MICHELLE Y. MCISAAC Bar No. 215294
 One Market Plaza
 3 Steuart Tower, 8th Floor
 San Francisco, California 94105
 4 Telephone: (415) 781-7900
 Facsimile: (415) 781-2635
 5

6 Attorneys for Defendants
 Metropolitan Life Insurance Company and
 Bank of America Long Term Disability Benefits Plan
 7 (erroneously sued as Bank of America Long Term Disability Plan)

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10

11 LENA MONZON RAMOS,

12 Plaintiff,

13 v.

14 BANK OF AMERICA; METROPOLITAN
 LIFE INSURANCE COMPANY; BANK
 15 OF AMERICA LONG TERM
 DISABILITY PLAN,
 16

17 Defendants.

CASE NO. CV 08-01375 PJH

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND BRIEFING
 SCHEDULE FOR DISPOSITIVE
 MOTIONS**

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

22 1. On January 29, 2010, this Court issued its Order regarding the standard of review,
 23 which also clarifies whether Plaintiff may be permitted to offer evidence from outside the
 24 administrative record (which generally is permissible only if review is for abuse of discretion).
 25 (Doc. 63). The Order determined that the abuse of discretion standard applies, and Plaintiff
 26 therefore now intends to pursue pending discovery disputes that the parties had agreed to defer
 27 while awaiting the Court’s ruling on plaintiff’s motion regarding the standard of review.

28 2. The parties anticipate that some of the issues raised in the pending discovery

1 DATED: February 12, 2010

SEDGWICK, DETERT, MORAN & ARNOLD LLP

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By: /s/ Michelle Y. McIsaac

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Rebecca A. Hull

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Michelle Y. McIsaac

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Attorneys for Defendants

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Metropolitan Life Insurance Company and Bank of

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America Long Term Disability Benefits Plan

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DATED: February 12, 2010

THE LAW OFFICE OF JOSEPH CREITZ, P.C.

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By: /s/ Joseph Creitz

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Joseph Creitz

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Attorney for Plaintiff

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Lena Monzon Ramos

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ORDER

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Upon the stipulation of the parties, IT IS SO ORDERED.

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DATED: 2/17/10

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UNITED STATES DISTRICT COURT JUDGE

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