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 STANDARD INSURANCE COMPANY and THE
 7 LUCASFILM LTD. GROUP LONG TERM
 DISABILITY PLAN
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9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 OAKLAND DIVISION

13 **BRENT OSTER,**

14 **Plaintiff,**

15 **v.**

16 **STANDARD INSURANCE COMPANY;
 THE LUCASFILM LTD. GROUP
 17 LONG TERM DISABILITY PLAN; and
 DOES 1 through 20, inclusive,**

18 **Defendants.**
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Case No. C 09-00851 (SBA)

**JOINT STIPULATION REGARDING
 SCHEDULE FOR PARTIES'
 BENEFITS CALCULATION AND
 ORDER**

1 Plaintiff Brent Oster and Defendants Standard Insurance Company (“Standard”) and The
2 Lucasfilm Ltd. Group Long Term Disability Plan (the “Disability Plan”), each through their
3 respective counsel of record, hereby stipulate as follows:

4 WHEREAS on October 8, 2010, the Court filed under seal Findings of Fact and
5 Conclusions of Law, ordering the parties to (1) “meet and confer in an effort to reach a stipulation
6 regarding the amount of benefits owed under the Policy, including consideration of any
7 applicable offsets” and (2) “submit such a stipulation, or ... each submit an additional brief, not to
8 exceed five (5) pages (excluding any supporting declaration(s)), addressing the amount of
9 benefits owed under the Policy” by October 29, 2010;

10 WHEREAS collection and analysis of Plaintiff’s sources of income are necessary for the
11 calculation of “benefits owed under the Policy, including consideration of any applicable offsets;”

12 WHEREAS Plaintiff has been engaged in obtaining copies of documents relating to his
13 income for the calculation of benefits and consideration of applicable offsets;

14 WHEREAS Plaintiff has requested copies of documentation of his income not in his
15 possession from outside sources, including the California Employment Development Department;

16 WHEREAS once necessary documentation of Plaintiff’s income is obtained, Plaintiff will
17 promptly produce said documentation without redactions to Standard, subject to Standard’s
18 representation that it will not share such documentation with any third party, due to privacy
19 concerns, except for those actuaries it uses for the calculation of benefits;

20 WHEREAS upon receipt of necessary documentation of all Plaintiff’s income, Standard
21 and Plaintiff will independently engage in an analysis of the documents and the requirements of
22 the Plan Policy, and will perform the benefits calculation required by Plaintiff’s multiple sources
23 of income;

24 WHEREAS due to the complexity of the calculation of benefits, the parties reasonably
25 anticipate that follow up and consultations with actuaries may delay the calculation of benefits,
26 even once Plaintiff provides the above-mentioned documentation;

27 WHEREAS the parties would like the opportunity to attempt to resolve the calculation of
28 benefits by stipulation, and without further motion practice;

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AS STIPULATED, IT IS SO ORDERED.

Dated: October 25_, 2010



Honorable Sandra B. Armstrong
United States District Judge