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12 Attorney for Plaintiff
 JEFFREY LYNN

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA

16	JEFFREY LYNN,)	CASE NO. C 10-01306 CW
17)	
18	Plaintiff,)	
19	vs.)	STIPULATION TO EXTEND TIME TO
20	PACIFIC GAS & ELECTRIC COMPANY,)	FILE FIRST AMENDED COMPLAINT
21	Defendant.)	
22)	
23)	

24 Defendant and Plaintiff, through their respective counsels of record, hereby stipulate to
 25 extend the time for Plaintiff to file the first amended complaint, pursuant to the Court's Order
 26 Granting And Denying In Part Defendant's Motion To Dismiss, from 7 days to 21 days.

1 Good cause exists to grant this stipulated request for extension because Plaintiff's counsel
2 is out of the office on vacation from June 21, 2010 through July 3, 2010, and unable to gain
3 access to a computer due to his travel schedule. Plaintiff's counsel received the Court's Order on
4 June 22, 2010 via his Blackberry mobile device, requiring the amended complaint be filed by
5 June 28, 2010. Plaintiff's counsel is unable to comply with the Court's order but Plaintiff will
6 amend the complaint, dismissing Defendant PG&E and adding the proper ERISA Plan as the
7 defendant, and dismiss the request for ERISA penalties for alleged failure of Defendant to timely
8 produce a requested copy of the LTD plan. The amended complaint will be filed upon Plaintiff's
9 counsel's return from vacation.
10

11
12 The parties hereby stipulate and respectfully request the time for filing the amended
13 complaint may be extended from June 28, 2010 to July 12, 2010.
14

15
16 DATED: June 24, 2010

LAW OFFICES OF P. RANDALL NOAH

17
18 By /s/ P. Randall Noah
19 P. Randall Noah
Attorney for Plaintiff
JEFFREY LYNN

20
21 DATED: June 24, 2010

SEYFARTH SHAW LLP

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24 By /s/ Kathleen Cahill Slaughter
25 Kathleen Cahill Slaughter
Sarah K. Hamilton
Attorneys for Defendant
PACIFIC GAS & ELECTRIC COMPANY

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ORDER

IT IS SO ORDERED.

DATED: 6/25/2010



Hon. Judge Claudia Wilken
United States District Court Judge

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