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AT&T UMBRELLA BENEFIT PLAN NO. 1
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION
11

12 JOHN DOE,
13 Plaintiff,
14 vs.
15 AT&T UMBRELLA BENEFIT PLAN NO.1
16 Defendant.

Case No. C11-04603 DMR

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING CASE
MANAGEMENT CONFERENCE,
FEDERAL RULE 26(F)
REQUIREMENTS AND CASE
MANAGEMENT STATEMENT**

Judge: Magistrate Judge Ryu

Amended Complaint filed: October 19, 2011

1 This Stipulation is entered into by and among Plaintiff John Doe (“Plaintiff”),
2 Defendant AT&T UMBRELLA BENEFIT PLAN NO. 1 (“Defendant”), by and through their
3 respective counsel.

4 WHEREAS the Complaint was filed on September 16, 2011 against AT&T Western
5 Disability Benefits Program.

6 WHEREAS the case schedule was generated on the date the Complaint was filed.

7 WHEREAS counsel for the respective parties met and conferred regarding the proper
8 defendant in this litigation.

9 WHEREAS Plaintiff filed his Amended Complaint on October 19, 2011, to name the
10 proper defendant.

11 WHEREAS Defendant’s response to the Amended Complaint is due on December 16,
12 2011.

13 WHEREAS the parties currently are scheduled to file a Rule 26(f) Report, complete
14 initial disclosures or state objection in the Rule 26(f) Report, and file a Joint Case Management
15 Statement on December 21, 2011.

16 WHEREAS Defendant needs additional time to gather, prepare and redact the
17 Administrative Record to comply with the Order Granting Plaintiff’s Motion to Proceed Under
18 Fictitious Name.

19 WHEREAS lead trial counsel for Defendant is scheduled to be on vacation beginning
20 December 15, 2011 through January 2, 2012.

21 WHEREAS Plaintiff’s lead trial counsel is unable to attend a Case Management
22 Conference on January 11, 2012 due to previously-scheduled work-related travel.

23 WHEREAS the parties have agreed to continue the deadline to file a Rule 26(f) Report,
24 complete initial disclosures or state objection in the Rule 26(f) Report, and file a Joint Case
25 Management Statement until January 11, 2012.

26 WHEREAS the parties have agreed to continue the Initial Case Management
27 Conference until January 18, 2012.

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1 WHEREAS the extension will not alter the date of any other event or deadline already
2 fixed by the Court.

3 **IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned
4 counsel for Plaintiff and Defendant, as follows:

5 1. The last day to file the Rule 26(f) Report, complete initial disclosures or state objection
6 in the Rule 26(f) Report, and file the Case Management Statement is hereby continued
7 from December 21, 2011 to January 11, 2012.

8 2. The Initial Case Management Conference currently scheduled for December 28, 2011 at
9 1:30 pm is hereby continued to January 18, 2012 at 1:30 p.m.

11 Respectfully Submitted,

13 Dated: December 7, 2011 AT&T Services Legal Department

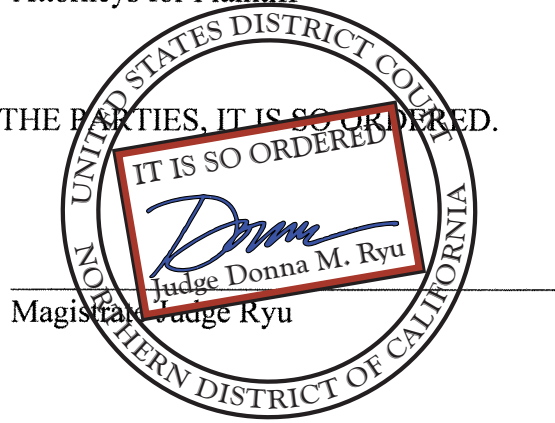
15 /s/ Theresa M. Cabreros
16 Theresa M. Cabreros
17 Attorney for Defendant

18 Dated: December 7, 2011 Lewis, Feinberg, Lee, Renaker & Jackson, P.C.

20 /s/ Lindsay Nako
21 Lindsay Nako
22 Attorneys for Plaintiff

23 PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED.

25 December 8
26 Dated: _____, 2011



Magistrate Judge Ryu