

Winston & Strawn LLP
101 California Street
San Francisco, CA 94111-5802

1 Joseph J. Torres (admitted *pro hac vice*)
Lauren B. Neubauer (admitted *pro hac vice*)
2 WINSTON & STRAWN LLP
35 West Wacker Drive
3 Chicago, IL 60601
jtorres@winston.com
4 lneubauer@winston.com
Telephone: (312) 558-5600
5 Facsimile: (312) 558-5700

6 Jeffrey S. Bosley (SBN: 167629)
Elisabeth A. Derby (SBN: 267421)
7 WINSTON & STRAWN LLP
101 California Street
8 San Francisco, CA 94111-5802
jbosley@winston.com
9 bderby@winston.com
Telephone: (415) 591-1000
10 Facsimile: (415) 591-1400

11 Attorneys for Defendants
ABBOTT LABORATORIES EXTENDED DISABILITY PLAN
12 and MATRIX ABSENCE MANAGEMENT, INC.

13 Glenn R. Kantor (SBN: 122643)
KANTOR & KANTOR, LLP
14 19839 Nordhoff Street
Northridge, CA 91324
15 Telephone: (818)886-2525
Facsimile: (818)350-6272
16 E-mail: gkantor@kantorlaw.net

17 Attorney for Plaintiff
BELINDA WEATHERSBY

18
19 **UNITED STATES DISTRICT COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA**
21 **SAN JOSE DIVISION**

22 BELINDA WEATHERSBY,) **Case No. CV 11-06187 LHK**
23 Plaintiff,) **STIPULATED REQUEST FOR ORDER**
24 vs.) **CHANGING TIME**
25 MATRIX ABSENCE MANAGEMENT, INC.)
and ABBOTT LABORATORIES EXTENDED)
26 DISABILITY PLAN,)
Defendants.)

1 Pursuant to Local Rule 6-2, Plaintiff Belinda Weathersby (“Plaintiff”) and Defendants,
2 Matrix Absence Management, Inc. and Abbott Laboratories Extended Disability Plan (collectively
3 the “Defendants”), through their respective attorneys of record hereby submit this Stipulated Request
4 for Order Changing Time.

5 WHEREAS, on January 11, 2012, following reassignment of this case to Judge Koh, the
6 Case Management Conference in the above-referenced matter was set to April 4, 2012 and the
7 deadline for Case Management Statements was set for March 28, 2012; and

8 WHEREAS on January 19, 2012, Plaintiff served Defendants with a copy of the Complaint;
9 and

10 WHEREAS, on February 7, 2012, the parties filed a Stipulation extending the time for
11 responding to Plaintiff’s Complaint; and

12 WHEREAS, the Defendants filed an Answer to Plaintiff’s Complaint on February 29, 2012;
13 and

14 WHEREAS, no other time modifications have been entered in this case, whether by
15 stipulation or Court order; and

16 WHEREAS, the parties agree that the deadlines initially set by the Magistrate Judge in the
17 Order Setting Initial Case Management Conference and ADR Deadlines should be moved in light of
18 the filing date of Defendants’ Answer; and

19 WHEREAS, the requested time modifications will not affect the date of the Case
20 Management Statement or Case Management Conference already established by this Court.

21 IT IS THEREFORE HEREBY STIPULATED by and among the parties that:

- 22 1. March 14, 2012 shall serve as the last day to:
 - 23 a. Meet and confer re: initial disclosures, early settlement, ADR process selection,
24 and discovery plan;
 - 25 b. File ADR Certification signed by Parties and Counsel; and
 - 26 c. File either Stipulation to ADR Process or Notice of Need for ADR Phone
27 Conference.
- 28 2. March 28, 2012 shall serve as the last day to:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- a. File 26(f) Report;
 - b. Complete initial disclosures or state objection in Rule 26(f) Report.
3. Per the Court's January 12, 2012 Order (Dkt. 8), March 28, 2012 shall serve as the last day to file a Case Management Statement per the Standing Order re Contents of Joint Case Management Statement.

Dated: March 9, 2012

WINSTON & STRAWN LLP

By: /s/ Elisabeth A. Derby
Elisabeth A. Derby

Attorney for Defendants
MATRIX ABSENCE
MANAGEMENT, INC. and
ABBOTT LABORATORIES
EXTENDED DISABILITY PLAN

Dated: March 9, 2012

KANTOR & KANTOR

By: /s/ Glenn R. Kantor
Glenn R. Kantor

Attorney for Plaintiff
BELINDA WEATHERSBY

CONCURRENCE IN FILING

Pursuant to Section X of General Order 45, I, Elisabeth A. Derby, attest that concurrence in the filing of the document has been obtained from Glenn R. Kantor, which shall serve in lieu of his signature on the document.

Dated: March 9, 2012

/s/ Elisabeth A. Derby
Elisabeth A. Derby

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: March 12, 2012



HON. LUCY H. KOH
United States District Judge