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1 2 3 4 5 6 7 8 9	THOMAS M. HERLIHY (SBN 83615) JOHN T. BURNITE (SBN 162223) WILSON, ELSER, MOSKOWITZ, EDELMAN 525 Market Street, 17 <sup>th</sup> Floor San Francisco, CA 94105-2725 Tel.: (415) 433-0990 Fax: (415) 434-1370 Email: herlihy@wilsonelser.com john.burnite@wilsonelser.com  Attorneys for Defendants UNUM GROUP (formerly known as UNUMPROVIDENT CORPORATION) and THE PAUL REVERE LIFE INSURANCE COM		
10   11			
12	UNITED STATES DISTRICT COURT		
13	NORTHERN DISTRI	CT OF CALIFORNIA	
14	SEAN S. MAY, M.D.	) Case No.: C09-01537 VRW (ADR)	
15	Plaintiff,	) ) )	
16	VS.	) STIPULATION TO EXTEND ) RESPONSIVE PLEADING DEADLINE	
17 18	UNUMPROVIDENT CORPORATION, THE PAUL REVERE LIFE INSURANCE COMPANY and UNUM GROUP, inclusive,	AND TO CONTINUE CASE  MANAGEMENT CONFERENCE;  PROPOSED ORDER  ORDER	
19	Defendants.	) )	
20		)	
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28			
	STIPULATION TO EXTEND RESPONSIVE PLEADING DEADLINE AND TO CONTINUE CASE MANAGEMENT		

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1	The parties, plaintiff Sean S. May, M.D. and defendants Unum Group (formerly known		
2	as UnumProvident Corporation), and The Paul Revere Life Insurance Company are in the		
3	process of discussing settlement, which may include setting an early mediation within the next		
4	45 days. Accordingly, the parties, through their respective attorneys, respectfully request that the		
5	court approve this stipulation and extend defendants' responsive pleading deadline and the initial		
6	case management conference by 45 days.		
7	Pursuant to Northern District Local Rule 6-1(a), the parties, hereby stipulate that		
8	defendants shall have an extension to respond to the complaint from January 22, 2010 to and		
9	including March 8, 2010.		
10	The parties further stipulate to continue the Case Management Conference presently		
11	scheduled for February 11, 2010 to March 28, 2010. APRIL 22, 2010 at 3:30 PM.		
12	Good cause exists for the parties' stipulation and proposed order insofar the continued		
13	dates will promote the public policy of encouraging parties to explore early resolution of		
14	litigation.		
15	15		
16	IT IS SO STIPULATED.		
17	17 KNOX RICKSEN, LLP		
18			
19	19 Dated: January 22, 2010 By/s/		
20	Thomas F. Frayssa	<del></del>	
21			
22	22 WILSON, ELSER, MOSKOWIT	Z, EDELMAN &	
23	23 DICKER LLP		
24			
25	Dated: January 22, 2010  By/s/  Thomas M. Herlihy		
26	John T. Burnite		
27	Attorney for Defendants UNUM GROUP (formerly	y known as	
28	UNUMPROVIDENT CO		
-1-			
	STIPULATION TO EXTEND RESPONSIVE PLEADING DEADLINE AND TO CONTI	INUE CASE MANAGEMENT	

STIPULATION TO EXTEND RESPONSIVE PLEADING DEADLINE AND TO CONTINUE CASE MANAGEMENT CONFERENCE; [PROPOSED] ORDER

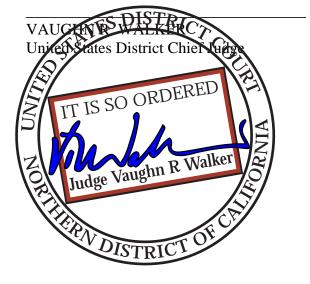
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**ORDER** 

IT IS SO ORDERED that defendants shall have an extension to respond to the complaint from January 22, 2010 to and including **March 8, 2010**. It is further ordered that the Case Management Conference is continued from February 11, 2010 to March 28, 2010.

APRIL 22, 2010 at 3:30 PM.

Date: January <u>26</u>, 2009



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