

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. Accordingly,
4 the parties, through their respective attorneys, respectfully request that the court approve this
5 stipulation and extend defendants' responsive pleading deadline and the initial case management
6 conference.

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 March 8, 2010 to May 10,
9 2010. In the alternative, if the CMC date is not continued, the parties stipulate that defendants'
10 responsive pleading shall be extended from March 8, 2010 to March 29, 2010.

11 The parties further stipulate to continue the Case Management Conference presently
12 scheduled for April 22, 2010 to June 24, 2010.

13 Good cause exists for the parties' stipulation and proposed order insofar the continued
14 dates will promote the public policy of encouraging parties to explore early resolution of
15 litigation.

16 **IT IS SO STIPULATED.**

17 KNOX RICKSEN, LLP

19 Dated: March 8, 2010

By _____/s/_____
20 Thomas E. Fraysse
21 Attorney for Plaintiff
SEAN S. MAY, M.D.

22 WILSON, ELSER, MOSKOWITZ, EDELMAN &
23 DICKER LLP

24 Dated: March 8, 2010

By _____/s/_____
25 Thomas M. Herlihy
26 John T. Burnite
27 Attorney for Defendants
UNUM GROUP (formerly known as
28 UNUMPROVIDENT CORPORATION) and THE
PAUL REVERE LIFE INSURANCE COMPANY

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ORDER

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IT IS SO ORDERED that defendants shall have an extension to respond to the complaint from March 8, 2010 to and including [March 29, 2010 or May 10, 2010]. It is further ordered that the Case Management Conference is continued from April 22, 2010 to June 24, 2010.

Date: March 10, 2010

VAUGHN R. WALKER
United States District Judge
