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5 Attorneys for Defendants
 LINCOLN NATIONAL LIFE INSURANCE CO. and
 6 JEFFERSON PILOT FINANCIAL INSURANCE
 COMPANY

7
 8 **UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**

11	CATHRYN REID,)	CASE NO.: C 10-02332 MMC
12	Plaintiff,)	
13	vs.)	STIPULATION TO CONTINUE INITIAL
14	ACCREDO HEALTH, INC., a Delaware)	CASE MANAGEMENT CONFERENCE
15	corporation; MEDCO HEALTH)	FROM SEPTEMBER 3, 2010 TO
16	SOLUTIONS, INC., a Delaware Corporation;)	OCTOBER 29, 2010 AND PROPOSED
17	LINCOLN NATIONAL LIFE INSURANCE)	ORDER
18	CO., an Indiana corporation; JEFFERSON)	1 st Amended Complaint Filed: April 2, 2010
19	PILOT FINANCIAL INSURANCE)	
20	COMPANY, a Nebraska corporation; SUN)	
	LIFE ASSURANCE COMPANY OF)	
	CANADA, a Canadian corporation as DOE 1;)	
	and DOES 2 to 25, inclusive,)	
	Defendants.)	

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 22 Plaintiff CATHRYN REID and Defendants LINCOLN NATIONAL LIFE INSURANCE
 23 CO., JEFFERSON PILOT FINANCIAL INSURANCE COMPANY, ACCREDO HEALTH
 24 GROUP, INC., MEDCO HEALTH SOLUTIONS, INC., and SUN LIFE ASSURANCE
 25 COMPANY OF CANADA, by and through their counsel of record, hereby stipulate to the
 26 following:

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 28 i:\office\10564\008\10pleadings\stip continue cmc hearing.doc

**STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE FROM
 SEPTEMBER 3, 2010 TO OCTOBER 29, 2010
 CASE NO.: C 10-02332 MMC**

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Dated: August 26, 2010

DONAHUE GALLAGHER WOODS LLP

By: /s/ George J. Barron
GEORGE J. BARRON
Attorneys for Plaintiff CATHRYN REID

Dated: August 26, 2010

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Donald P. Sullivan
DONALD P. SULLIVAN
NICOLE A. DILLER
Attorneys for Defendants ACCREDO
HEALTH GROUP, INC. and MEDCO
HEALTH SOLUTIONS, INC.

Dated: August 26, 2010

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

By: /s/ Christopher M. Ahearn
MARK SCHMIDTKE
CHRISTOPHER M. AHEARN
Attorneys for Defendant SUN LIFE
ASSURANCE COMPANY OF
CANADA

1 **DECLARATION OF JENNIFER N. LEE**

2 1. I am an attorney at law, duly licensed in all courts of the State of California, and am an
3 associate of the law firm of Barger & Wolen LLP, counsel of record for Defendants LINCOLN
4 NATIONAL LIFE INSURANCE CO. ("Lincoln National") and JEFFERSON PILOT FINANCIAL
5 INSURANCE COMPANY ("Jefferson Pilot") in the above-entitled action. I make this declaration
6 in support of the parties' Stipulation to Continue the Initial Case Management Conference from
7 September 3, 2010 to October 29, 2010. I have personal knowledge of the matters set forth herein.
8 If called as a witness, I could and would testify competently thereto.

9 2. On May 27, 2010, the Court issued a Scheduling Order, setting the initial case management
10 conference for Friday, September 3, 2010 at 10:30 a.m. and ordering that a joint case management
11 conference statement be filed by August 27, 2010.

12 3. On Thursday, August 12, 2010, counsel for all parties in this case met and conferred
13 pursuant to Federal Rule of Civil Procedure 26(f) and I attended this telephonic conference.

14 4. During the conference, the parties agreed that the production of initial disclosures will assist
15 all of the parties in formulating their respective positions in the case, including, but not limited to,
16 the timing issues for and making determinations as to whether to amend the complaint or other
17 pleadings, dismiss certain defendants, pursue Rule 12 and 56 motions, and, the timing for pursuing
18 Alternative Dispute Resolution.

19 5. Initial disclosures in this case are scheduled to be produced on or before August 27, 2010.
20 During the Rule 26(f) conference, several parties indicated that they were in the process of
21 obtaining documents for the initial disclosures and had not yet received all the documents to be able
22 to presently make any disclosures. The parties have indicated that they will be able to make initial
23 disclosures by the August 27, 2010 deadline.

24 6. Based on the foregoing, counsel for the parties during the Rule 26(f) conference agreed that
25 in the interest of judicial economy, the parties would jointly request a 30-day continuance of the
26 September 3, 2010 initial case management conference and deadline to file a joint case management
27 statement. The parties further agreed to proceed with making initial disclosures by the current
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1 deadline of August 27, 2010 and meeting and conferring thereafter to prepare a joint case
2 management statement based on information obtained through disclosures.

3 7. The first Friday following a 30-day continuance of the September 3rd hearing date is
4 October 8, 2010. Counsel have met and conferred regarding available Fridays in October 2010 on
5 which to request a continued conference. All counsel have indicated their agreement to an October
6 29, 2010 conference date and October 15, 2010 deadline for filing a joint case management
7 statement.

8 8. There have been no prior requests for time modifications in this case.

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10 I declare under penalty of perjury under the laws of the State of California and the United
11 States that the foregoing is true and correct.

12 Executed this 26th day of August, 2010 in San Francisco, California.

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16 JENNIFER N. LEE

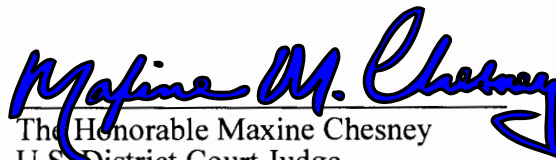
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ORDER

For good cause showing, the Court hereby continues the September 3, 2010 Initial Case Management Conference scheduled in this case to October 29, 2010 to 10:30 a.m. in Courtroom 7 of this Court. The case management conference statement shall be filed on or before October 15, 2010.

PURSUANT TO STIPLUATION, IT IS SO ORDERED.

Dated: August 27, 2010


The Honorable Maxine Chesney
U.S. District Court Judge