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6 Attorneys for Plaintiff
 7 CATHRYN REID

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

12 CATHRYN REID,
 13 Plaintiff,
 14 v.
 15 ACCREDO HEALTH GROUP, INC., a
 Delaware corporation; MEDCO HEALTH
 16 SOLUTIONS, INC., a Delaware
 corporation; LINCOLN NATIONAL LIFE
 17 INSURANCE CO., an Indiana corporation;
 JEFFERSON PILOT FINANCIAL
 18 INSURANCE COMPANY, a Nebraska
 corporation; SUN LIFE ASSURANCE
 19 COMPANY OF CANADA, a Canadian
 corporation as DOE 1; and DOES 2 to 25,
 20 inclusive,
 21 Defendants.

CASE NO. CV 10-02332 MMC
 STIPULATION, DECLARATION AND
 [PROPOSED] ORDER TO CONTINUE CASE
 MANAGEMENT CONFERENCE FROM
 JUNE 10, 2011 TO AUGUST 26, 2011
 AND ORDER THEREON

23 Pursuant to Local Rule 6, this stipulation is made by and between plaintiff Cathryn Reid
 24 and defendants Accredo Health Group, Inc., Medco Health Solutions, Inc., Lincoln National Life
 25 Insurance Co., Jefferson Pilot Financial Insurance Company, and Sun Life Assurance Company
 26 of Canada, by and through their respective counsel of record, with respect to the following:
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1 WHEREAS, on August 26, 2010, the parties filed a stipulation continuing the initial case
2 management conference from September 3, 2010 to October 29, 2010, which the Court approved
3 on August 27, 2010;

4 WHEREAS, on October 29, 2010, the Court held an initial case management conference
5 in this matter, which conference the Court continued to May 13, 2011;

6 WHEREAS, the parties filed a stipulation continuing the May 13, 2011 case management
7 conference to June 10, 2011, which the Court approved on April 11, 2011;

8 WHEREAS, a primary reason for continuing the earlier case management conference was
9 to allow sufficient time for plaintiff to make and complete the life insurance benefit claims herein.
10 While significant progress has been made, those claims are not complete and more time is needed
11 to do so, see Declaration of George J. Barron, attached hereto and incorporated herein by
12 reference.

13 WHEREAS, counsel for all parties have discussed their availability and determined that
14 all counsel can attend a case management conference on August 26, 2011;

15 NOW, THEREFORE, the parties hereby jointly request, and respectfully ask the Court to
16 order, as follows:

17 That the case management conference be continued to August 26,
18 2011, with a joint case management conference statement due on or
19 before August 19, 2011.

20 IT IS SO STIPULATED.

21 Dated: June 3, 2011

DONAHUE GALLAGHER WOODS LLP

23 By: /s/ George J. Barron
24 George J. Barron

25 Attorneys for Plaintiff
26 Cathryn Reid

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Dated: June 3, 2011

BARGER & WOLEN LLP

By: /s/ Jennifer N. Lee

Martin E. Rosen
Jennifer N. Lee

Attorneys for Defendants
Lincoln National Life Insurance Co. and
Jefferson Pilot Financial Insurance Company

Dated: June 3, 2011

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Nicole A. Diller

Nicole A. Diller
Angel T. Lin

Attorneys for Defendants
Accredo Health, Inc. and
Medco Health Solutions, Inc.

Dated: June 3, 2011

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

By: /s/ Christopher M. Ahearn

Mark Schmidtke
Christopher M. Ahearn

Attorneys for Defendants
Sun Life Assurance Company Of Canada

ATTESTATION

Pursuant to General Order 45(X), I attest that concurrence in the filing of this document
has been obtained from each of the other signatories.

Dated: June 3, 2011

DONAHUE GALLAGHER WOODS LLP

By: /s/ George J. Barron

George J. Barron

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~~PROPOSED~~ ORDER

Pursuant to stipulation, the Court hereby ORDERS as follows:

1. The case management conference is continued from June 10, 2011 to August 26, 2011; and
2. The joint case management conference statement is due on or before August 19, 2011.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 6, 2011


The Honorable Maxine M. Chesney
United States District Court Judge