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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 15, 2012 TO JULY 13, 2012 AND  
 ORDER THEREON

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1 Pursuant to Local Rule 6, this stipulation is made by and between plaintiff Cathryn Reid  
2 and defendants Accredo Health Group, Inc., Medco Health Solutions, Inc., Lincoln National Life  
3 Insurance Co., Jefferson Pilot Financial Insurance Company, and Sun Life Assurance Company  
4 of Canada, by and through their respective counsel of record, with respect to the following:

5 WHEREAS, on August 26, 2010, the parties filed a stipulation continuing the initial case  
6 management conference from September 3, 2010 to October 29, 2010, which the Court approved  
7 on August 27, 2010;

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

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

12 WHEREAS, the parties filed a stipulation continuing the June 10, 2011 case management  
13 conference to August 26, 2011, which the Court approved on June 6, 2011;

14 WHEREAS, the parties filed a stipulation continuing the August 26, 2011 case  
15 management conference to November 18, 2011, which the Court approved on August 22, 2011;

16 WHEREAS, the parties filed a stipulation continuing the November 18, 2011 case  
17 management conference to February 10, 2012, which the Court approved on November 15, 2011;

18 WHEREAS, the parties filed a stipulation continuing the February 10, 2012 case  
19 management conference to March 30, 2012, which the Court approved on February 6, 2012;

20 WHEREAS, the parties filed a stipulation continuing the March 30, 2012 case  
21 management conference to April 20, 2012, which the Court approved on March 26, 2012;

22 WHEREAS, the parties filed a stipulation continuing the April 20, 2012 case management  
23 conference to May 25, 2012, which the Court approved on April 16, 2012;

24 WHEREAS, the parties filed a stipulation continuing the May 25, 2012 case management  
25 conference to June 15, 2012, which the Court approved on May 18, 2012;

26 WHEREAS, a primary reason for continuing the earlier case management conferences  
27 was to allow sufficient time for plaintiff to make and complete the life insurance benefit claims  
28 herein. Those claims procedures with the Defendant Insurers were completed and settlement

1 discussions were started;

2 WHEREAS, the Defendants' stipulation for a continuance should not be construed as an  
3 admission with regard to the timeliness of any claim or appeal by the Plaintiff;

4 WHEREAS, Plaintiff and all Defendants have been and still are engaged in settlement  
5 negotiations. Multiple offers and counteroffers have been exchanged. A settlement has been  
6 reached with Defendant Accredo/Medco. Plaintiff is monetarily close to reaching a settlement  
7 with a second defendant; substantial progress toward settlement has been made with the final  
8 defendant. All defendants are working on terms among themselves to insure the finality of a  
9 settlement and the end of any claims related to this case among the parties. All parties request an  
10 additional continuance so that the parties can finalize settlement or attempt to resolve the case  
11 without further involvement of the Court;

12 WHEREAS, all parties agree that continuing the June 15, 2012 Case Management  
13 Conference to July 13, 2012 will allow the parties time to explore settlement options. If the case  
14 has not settled, the parties will either request a Settlement Conference with Magistrate Judge  
15 and/or ask to schedule motions and a trial date. See Declaration of George J. Barron filed  
16 herewith.

17 WHEREAS, counsel for all parties have discussed their availability and determined that  
18 all counsel can attend a case management conference on July 13, 2012;

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

21 That the case management conference be continued to July 13,  
22 2012, with a joint case management conference statement due on or  
before July 6, 2012.

23 IT IS SO STIPULATED.

24 Dated: June 8, 2012

DONAHUE GALLAGHER WOODS LLP

26 By: /s/ George J. Barron  
27 George J. Barron  
Attorneys for Plaintiff  
28 Cathryn Reid

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Dated: June 8, 2012

BARGER & WOLEN LLP

By: /s/ Dawn N. Valentine  
Martin E. Rosen  
Dawn N. Valentine  
  
Attorneys for Defendants  
Lincoln National Life Insurance Co. and  
Jefferson Pilot Financial Insurance Company

Dated: June 8, 2012

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 8, 2012

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

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**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 8, 2012

DONAHUE GALLAGHER WOODS LLP

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



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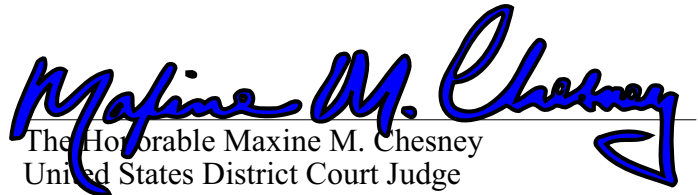
~~PROPOSED~~ ORDER

Pursuant to stipulation, the Court hereby ORDERS as follows:

1. The case management conference is continued from June 15, 2012 to July 13, 2012; and
2. The joint case management conference statement is due on or before July 6, 2012.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 11, 2012

  
The Honorable Maxine M. Chesney  
United States District Court Judge