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 SUN LIFE ASSURANCE COMPANY OF CANADA
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 7 BENEFIT PLAN

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13 Attorneys for Plaintiff KAREN KNIPPING

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 15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA**
 17 **SAN FRANCISCO**

18 KAREN KNIPPING
 19 Plaintiff,
 20 v.
 21 CROWLEY HOLDINGS, INC., EMPLOYEE
 BENEFIT PLAN; SUN LIFE ASSURANCE
 22 COMPAY OF CANADA
 23 Defendants.

Case No. 13-02474-RS

SECOND STIPULATION AND [PROPOSED]
 ORDER EXTENDING TIME FOR
 DEFENDANTS TO ANSWER COMPLAINT

Complaint Filed: June 3, 2013
 Trial Date:
 Judge: Hon. Richard Seeborg

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1 Plaintiff Karen Knipping ("plaintiff") and defendants Sun Life Assurance Company of
2 Canada and the Crowley Holding Inc. Employee Benefit Plan ("defendants") (collectively "the
3 Parties") hereby stipulate as follows:

4 **STIPULATION**

5 The Parties previously agreed that defendants could have an extension of time to August 1,
6 2013, to answer Plaintiff's Complaint for Declaratory Relief for LTD Benefits ("the Complaint").
7 Recently, counsel in this matter had productive discussions about settlement of this matter and
8 have agreed to try to resolve this matter within the next 30 days. The Complaint is long and
9 complex and the parties agree that the possibility of settlement will be enhanced if defendants do
10 not have to spend the time and resources drafting the answer to the complaint. Defendants want to
11 focus on settlement.

12 Accordingly the Parties hereby stipulate that defendants have until Monday, September 2,
13 2013 to file an answer in this matter.

14 The parties also recognize that this matter cannot linger. There is a Case Management
15 Conference scheduled for October 3, 2013. This extension will not impact the Case Management
16 Conference or the Parties' preparation for the conference.

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IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

DATED: July 30, 2013

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

BY: /s/ Sean P. Nalty
Sean P. Nalty

Attorneys for Defendants
SUN LIFE ASSURANCE COMPANY OF
CANADA & CROWLEY HOLDINGS, INC.
EMPLOYEE BENEFIT PLAN

DATED: July 30, 2013

ERISA LAW GROUP

By: /s/ Robert J. Rosati
Robert J. Rosati
Thornton Davidson

Attorneys for Plaintiff KAREN KNIPPING

ATTESTATION

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

Dated: July 30, 2013

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART

By: /s/ Sean P. Nalty
Sean P. Nalty

Attorneys for Defendants
SUN LIFE ASSURANCE COMPANY OF
CANADA & CROWLEY HOLDINGS, INC.
EMPLOYEE BENEFIT PLAN

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ORDER

Based on the stipulation of the Parties stated above, and Good Cause appearing therefore, defendants have until September 2, 2013 to answer the Complaint in this matter.

DATED: 7/31/13



Honorable Richard Seeborg
United States District Court Judge

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