

1 Scott Kalkin 120791
ROBOOSTOFF & KALKIN
 2 A Professional Law Corporation
 369 Pine Street, Suite 820
 3 San Francisco, California 94104
 (415) 732-0282
 4
 5 Attorney for Plaintiff Richard Trecartin

6 Daniel W. Maquire 120002
 Kristin P. Kyle de Bautista 221750
 7 **Burke, Williams & Sorensen, LLP**
 444 South Flower Street, Suite 2400
 8 Los Angeles, CA 90071-2953
 213-236-0600
 9
 10 Attorneys for Defendants
 UNUM Life Insurance Company of America and
 Provident Life and Accident Insurance Company
 11

12
 13 IN THE UNITED STATES DISTRICT COURT
 14 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 15

16 Richard Trecartin,)
 17)
 Plaintiff,)
 18 v.)
 19 UNUM Life Insurance Company of)
 America, and Provident Life and)
 20 Accident Insurance Company,)
 21 Defendants.)
 22

ACTION NO.: C 13-05024 NC
**STIPULATION AND PROPOSED
 ORDER TO CONTINUE CASE
 MANAGEMENT CONFERENCE
 AND RELATED DEADLINES**

- 23 1. This is an ERISA long term disability case in which the case management
 24 conference is set for November 12, 2014.
 25 2. The complaint in this matter was filed on October 29, 2013.
 26 3. Pursuant to plaintiff's requests, the Court has granted several continuances of the
 27

1 case management conference so that the parties could engage in settlement discussions.

2 4. As of today's date, discussions are ongoing between plaintiff's counsel and in-house
3 counsel for defendants. These discussions are further detailed in the status report plaintiff
4 filed on September 11, 2014. (See, Dk. # 21.)

5 5. Pursuant to the Court's previous order of July 9, 2014, defendants have been served
6 with the complaint (by way of waivers of service filed on September 2, 2014). They filed their
7 answer to the complaint on November 3, 2014.

8 6. As noted above, the case management conference is currently set for November
9 12, 2014.

10 7. The administrative record in this case consists of approximately three thousand
11 pages of documents. Defense counsel, being recently retained in this matter, requires further
12 time to familiarize themselves with its contents.

13 8. Additionally, as noted above, negotiations between plaintiff's counsel and
14 defendants' in-house counsel are continuing, and the parties would like to continue their
15 efforts to settle this matter without incurring unnecessary legal fees.

16 9. In light of the forgoing, the parties jointly request that the case management
17 conference and associated dates be continued for approximately sixty (60) additional days.

18 Respectfully submitted,

19 **ROBOOSTOFF & KALKIN**

20
21 Dated: November 4, 2014

By: _____ /s/
Scott Kalkin
Attorneys for Plaintiff

22 //

23
24 //

25
26 //

27 _____

