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12 Attorneys for Defendants UNUM GROUP (formerly known as
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 13 INSURANCE COMPANY (erroneously sued as UNUM CORPORATION) and
 NEW YORK LIFE INSURANCE COMPANY

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20 **UNITED STATES DISTRICT COURT**
 21 **NORTHERN DISTRICT OF CALIFORNIA**

22	LYLE HUGHES,)	Case No.: CV07-04088 PJH
)	
23	Plaintiff,)	STIPULATION RE: DISCOVERY
)	DEADLINES
24	v.)	AND
)	[PROPOSED] ORDER
25	UNUMPROVIDENT CORPORATION; UNUM)	
	CORPORATION, NEW YORK LIFE)	
26	INSURANCE COMPANY, et al.,)	
)	
27	Defendants.)	

1 WHEREAS, at the Case Management Conference on November 13, 2008, the Court set a
2 trial date for this matter of May 10, 2010, and a deadline for dispositive motions to be heard by
3 January 13, 2010, with briefing to be completed by December 23, 2009; and

4 WHEREAS, the Court invited the parties to stipulate to revised deadlines for discovery in
5 accord with that trial schedule; and

6 THEREFORE, the parties, plaintiff Lyle Hughes (“plaintiff”) and defendants Unum Group
7 (formerly known as Unumprovident Corporation), First Unum Life Insurance Company (erroneously
8 sued as Unum Corporation) and New York Life Insurance Company by and through their respective
9 counsel of record, hereby stipulate and agree to the following discovery deadlines:

10	Fact Discovery Cut-off:	September 1, 2009
11	Expert Disclosures:	September 14, 2009
12	Rebuttal Expert Disclosures:	October 1, 2009
13	Expert Discovery Cut-off:	November 30, 2009

14 **IT IS SO STIPULATED**

15 Dated: November 24, 2008 WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

17 By: Thomas M. Herlihy
18 THOMAS M. HERLIHY
19 LAWRENCE J. ROSE
20 Attorneys for Defendants
21 UNUM GROUP (formerly known as UNUMPROVIDENT
CORPORATION), FIRST UNUM LIFE INSURANCE COMPANY
(erroneously sued as UNUM CORPORATION) and NEW YORK
LIFE INSURANCE COMPANY

22 Dated: November 24, 2008 BARGER & WOLEN

24 By: Jennifer Lee
25 JENNIFER LEE
26 J. RUSSELL STEDMAN
27 Attorneys for Defendant
NEW YORK LIFE INSURANCE COMPANY

1 Dated: November 24, 2008 BOURHIS & MANN

2
3 By: Lawrence Mann
4 RAY BOURHIS
5 LAWRENCE MANN
6 Attorneys for Plaintiff
7 LYLE HUGHES

8 **ORDER**

9 Good cause appearing, it is hereby ordered that the existing pretrial schedule be amended as
10 follows:

11 Fact Discovery Cut-off: September 1, 2009
12 Expert Disclosures: September 14, 2009
13 Rebuttal Expert Disclosures: October 1, 2009
14 Expert Discovery Cut-off: November 30, 2009

15 All other pretrial and trial dates will continue in place in accord with the Court's Minute
16 Order following the Case Management Conference held on November 13, 2008.

17 **IT IS SO ORDERED.**

18 November 26
19 Date: _____, 2008

