| THOMAS M. HERLIHY, ESQ. (SBN 83615)<br>SHEENA V. JAIN, ESQ. (SBN 251912)<br>WILSON, ELSER, MOSKOWITZ,<br>EDELMAN & DICKER LLP<br>525 Market Street, 17 <sup>th</sup> Floor<br>San Francisco, California 94105-2725<br>Telephone: (415) 433-0990<br>Facsimile: (415) 434-1370<br>Attorneys for Defendant |   |
|---|---|
| Unum Life Insurance Company of America  |   |
| MICHAEL B. HORROW (SBN 162917)<br>NICHOLE D. PODGURSKI (SBN 251240)<br>DONAHUE & HORROW, LLP<br>1960 E. Grand Ave., Suite 1215<br>El Segundo, California 90245<br>Telephone: (310) 322-0300<br>Facsimile: (310) 322-0302  |   |
| Attorneys for Plaintiff<br>Bandolph T. Scott  |   |
|   |   |
| UNITED STATES DISTRICT COURT  |   |
| NORTHERN DISTRICT OF CALIFORNIA   |   |
|   | KICI OF CALIFORNIA  |
| RANDOLPH T. SCOTT,  | ) Case No. C 09-01841 SBA   |
| Plaintiff,  | )<br>) STIPULATION TO CONTINUE LAST   |
|   | ) DATE TO HEAR DISPOSITIVE<br>) MOTIONS AND OTHER PRE-TRIAL   |
| UNUM LIFE INSURANCE COMPANY OF<br>AMERICA AND, DOES 1 THROUGH 10,<br>INCLUSIVE,   | DATES   |
| Defendants.   |   |
|   | )   |
|   |   |
| TO THE CLERK OF COURT AND ALL PARTIES IN THE ABOVE CAPTIONED  |   |
| MATTER:   |   |
| Parties in the above entitled action, plaintiff Randolph T. Scott, by and through his counsel of  |   |
| record, Michael Horrow, of Donahue & Horrow, and defendant Unum Life Insurance Company of   |   |
| America, by and through its counsel of record,  | Thomas M. Herlihy, of Wilson, Elser, Moskowitz,   |
|   | HEAR DISPOSITIVE MOTIONS & PRE-TRIAL DATES  |
| 556916.2  | Dockets.Justia.com  |
|   | SHEENA V. JAIN, ESQ. (SBN 251912)<br>WILSON, ELSER, MOSKOWITZ,<br>EDELMAN & DICKER LLP<br>525 Market Street, 17 <sup>th</sup> Floor<br>San Francisco, California 94105-2725<br>Telephone: (415) 433-0990<br>Facsimile: (415) 434-1370<br>Attorneys for Defendant<br>Unum Life Insurance Company of America<br>MICHAEL B. HORROW (SBN 162917)<br>NICHOLE D. PODGURSKI (SBN 251240)<br>DONAHUE & HORROW, LLP<br>1960 E. Grand Ave., Suite 1215<br>El Segundo, California 90245<br>Telephone: (310) 322-0300<br>Facsimile: (310) 322-0302<br>Attorneys for Plaintiff<br>Randolph T. Scott<br>UNITED STATE<br>NORTHERN DISTI<br>RANDOLPH T. SCOTT,<br>Plaintiff,<br>v.<br>UNUM LIFE INSURANCE COMPANY OF<br>AMERICA AND, DOES 1 THROUGH 10,<br>INCLUSIVE,<br>Defendants.<br>TO THE CLERK OF COURT AND AL<br>MATTER:<br>Parties in the above entitled action, plain<br>record, Michael Horrow, of Donahue & Horrow<br>America, by and through its counsel of record, 7 |

| 1  | Edelman & Dicker LLP hereby stipulate to continue the last date to hear dispositive motions to       |   |  |
|----|--|---|--|
| 2  | October 12, 2010. Parties further stipulate and agree to continue the following pre-trial deadlines: |   |  |
| 3  | Expert Designation – July 30, 2010   |   |  |
| 4  | Fact Discovery Cut-off – August 13, 2010   |   |  |
| 5  | Expert Discovery Cut-off – August 27, 2010   |   |  |
| 6  | Last day to file dispositive motions – September 7, 2010   |   |  |
| 7  | Last day to hear dispositive   | motions – October 19, 2010  |  |
| 8  |  |   |  |
| 9  | IT IS STIPULATED:  |   |  |
| 10 |  | Respectfully submitted,   |  |
| 11 |  | DONAHUE & HORROW LLP  |  |
| 12 |  |   |  |
| 13 | Date: July 14, 2010  | By <u>/s/</u><br>Michael B. Horrow                                |  |
| 14 |  | Nichole D. Podgurski<br>Attorneys for Plaintiff RANDOLPH T. SCOTT |  |
| 15 |  | Auomeys for Flamun KANDOLI II 1. SCOTT                            |  |
| 16 |  | WILSON, ELSER, MOSKOWITZ, EDELMAN &                               |  |
| 17 |  | DICKER LLP  |  |
| 18 | Date: July 14, 2010  | D <sub>M</sub> /c/  |  |
| 19 | Date. July 14, 2010  | By/s/<br>Thomas M. Herlihy  |  |
| 20 |  | Sheena V. Jain<br>Attorneys for Defendant                         |  |
| 21 |  | UNUM LIFE INSURANCE COMPANY<br>OF AMERICA                         |  |
| 22 |  | OF AMERICA  |  |
| 23 |  | ORDER   |  |
| 24 | IT IS SO ORDERED.  |   |  |
| 25 |  | •   |  |
| 26 | Date: 7/14/10  | famles B. Ormethag  |  |
| 27 |  | Saundra B. Armstrong<br>United States District Court Judge        |  |
| 28 |  |   |  |
| -  | STIPULATION TO CONTINUE I  | AST DATE TO HEAR DISPOSITIVE MOTIONS & PRE-TRIAL DATES            |  |
|    | 556916.2   | 2   |  |
|    |  |   |  |