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15 **IN THE UNITED STATES DISTRICT COURT**
 16 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 17 **SAN JOSE DIVISION**

18 PHI NGUYEN,) Case No. 5:14-cv-01880 RMW
 19)
 Plaintiff,) **STIPULATION**
 20 v.)
)
 21 UNUM LIFE INSURANCE COMPANY,)
)
 22 Defendants.)
 23)
 24)
 25)

1 IT IS HEREBY STIPULATED by and between the parties hereto through their
2 respective attorneys of record herein, that the deadlines and trial date in the matter be continued
3 for a period of 90 days to allow the parties to engage in settlement discussions. The deadlines at
4 issue are for the simultaneous filing of opening briefs in support of motions for judgment under
5 FRCP Rule 52 (May 1, 2015), simultaneous oppositions (May 29, 2015), and proposed findings
6 of fact and conclusions of law (July 7, 2015). The Court has set a bench trial for July 21, 2015.

7 Good cause exists for this request as the parties wish to conserve resources and pursue
8 resolution of this matter in good faith. Judicial economy as well as other legal resources will be
9 conserved if the parties are able to resolve this case prior to filing discovery motions and cross-
10 motions for judgment.

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13 **RIMAC MARTIN, P.C.**

14 DATED: April 10, 2015

By: /s/ Anna M. Martin
ANNA M. MARTIN
Attorneys for Defendant
UNUM LIFE INSURANCE COMPANY OF
AMERICA

17
18 **CAMPINS BENHAM-BAKER LLP**

19 DATED: April 10, 2015

By: /s/ Julia Campins
JULIA CAMPINS
Attorneys for Plaintiff
PHI NGUYEN

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22 Pursuant to Local Rule 5-1(i), I hereby attest that the signatories above have concurred in the
23 filing of this document.
24
25
26

CAMPINS BENHAM-BAKER LLP

DATED: April 10, 2015

By: /s/ Julia Campins
JULIA CAMPINS
Attorneys for Plaintiff
PHI NGUYEN

ORDER

That parties having stipulated thereto, IT IS HEREBY ORDERED that the deadlines and trial in the case shall be continued by 90 days. [REDACTED]

Ronald M. Whyte

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]