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 Company and Unum Group

12  
 13 UNITED STATES DISTRICT COURT  
 14 DISTRICT OF NEVADA

16 LEE R. TURNER, an individual,

17 Plaintiff,

18 v.

19 THE PAUL REVERE LIFE INSURANCE  
 COMPANY, a Massachusetts corporation;  
 20 UNUM GROUP, a Delaware corporation;  
 DOES I through X; and ROE  
 21 CORPORATIONS I through X, inclusive,

22 Defendants.

Case No. 2:14-cv-01205-JCM-VCF

**STIPULATION AND ORDER TO EXTEND  
 EXPERT DESIGNATION AND  
 REBUTTAL EXPERT DESIGNATION  
 DATES FOR THIRTY DAYS**

**(SECOND REQUEST)**

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 24 It is hereby requested and stipulated and agreed between Plaintiff, Lee R. Turner, by and  
 25 through his attorneys, and attorneys for Defendants that the initial and rebuttal expert designation  
 26 dates of September 4, 2015 and October 2, 2015 be extended for thirty days to allow the parties to  
 27 complete mediation on August 26, 2015, prior to having experts prepare the reports and  
 28 information required by FRCP 26.

1           The parties have been actively engaged in discovery in this action. Each side has  
2 provided initial disclosures and produced documents and responded to written discovery. The  
3 parties have also met and conferred with respect to the discovery responses and have reached  
4 agreements and exchanged supplemental discovery responses. In addition, Defendant has served  
5 multiple subpoenas to obtain discovery from third parties.

6           The parties also conferred regarding the scheduling of a mediation in this action and have  
7 scheduled a mediation to proceed on August 26, 2015. The parties began discussion regarding  
8 the scheduling of mediation in March of 2015, but time was required to find a mutually agreeable  
9 mediator and then the mediation date of August 26, 2015 was the earliest date available for a  
10 mutually agreeable mediator, counsel and the parties.

11           Currently, the initial expert designation date is September 4, 2015 and the rebuttal expert  
12 designation date is October 2, 2015. The parties request that these dates be extended by thirty  
13 days, to allow the parties sufficient time to complete the mediation before having their experts  
14 prepare the reports and disclosures that will be required for the expert designations. Because the  
15 discovery cut-off in this case is not until December 4, 2015, the parties will have sufficient time  
16 to complete the depositions of all designated experts and will cooperate to ensure that all expert  
17 depositions are completed within the discovery period.

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1           WHEREFORE, it is respectfully requested that the expert designation date of September  
2 4, 2015 be continued to October 5, 2015 and that the rebuttal expert designation date of October  
3 2, 2015 be continued to November 2, 2015.

4  
5 DATED this 25th day of June, 2015.

6 By: /s/ Joseph A. Gutierrez [as authorized on 6/25/15]

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26 *Attorneys for Plaintiff Lee R. Turner*

27  
28 DATED this 23<sup>rd</sup> day of June, 2015.

By: /s/ Edith S. Shea

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*and Unum Group*  
6

7  
8 **ORDER**

9 **IT IS SO ORDERED.**

10 DATED: this 29<sup>th</sup> day of June, 2015



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United States Magistrate Judge

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14 Respectfully Submitted by:

15 **BURKE, WILLIAMS & SORENSEN LLP**

16 By: */s/ Edith S. Shea*  
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