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THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

RENEE BERGESON,

Plaintiff,

Case No. 2:17-cv-00769-JLR

v.

THE PRUDENTIAL INSURANCE
COMPANY OF AMERICA; and
MICROSOFT CORPORATION WELFARE
PLAN,

Defendants.

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO ANSWER
OR OTHERWISE RESPOND TO
COMPLAINT**

NOTE ON MOTION CALENDAR:
July 6, 2017

Defendant Microsoft Corporation Welfare Plan (the "Plan"), by and through its attorneys, moves this Court for an order extending the time for the Plan to answer or otherwise respond to the complaint. The Plan's response or answer is currently due July 10, 2017. Plaintiff Renee Bergeson ("Plaintiff") does not oppose this motion. The Plan respectfully requests an extension of time to answer or otherwise respond until July 18, 2017. In support of its unopposed motion, the Plan states as follows:

1. On May 18, 2017, Plaintiff filed this action in the U.S.D.C. for the Western District of Washington.

2. Defendant The Prudential Insurance Company of America ("Prudential") was served through the Washington Insurance Commissioner, and its response is currently due July 18, 2017.

UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR
OTHERWISE RESPOND TO COMPLAINT
(No. 2:17-cv-00769-JLR) - 1
119219.0022/7010345.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107

1 3. The Plan was served on June 20, 2017, and its response is currently due on July
2 10, 2017.

3 4. The Plan began promptly collecting and reviewing the relevant file documents in
4 order to prepare a response to Plaintiff's complaint, but requests an additional time of 8 days to
5 complete its investigation and prepare its response.

6 5. Further, Prudential and the Plan are represented by the same counsel, and this
7 extension would allow Defendants' counsel to better coordinate Defendants' response to the
8 complaint.

9 6. On July 5, 2017, counsel for Defendants conferred with counsel for Plaintiff
10 regarding the request for an extension until July 18, 2017 to answer or otherwise respond to
11 Plaintiff's complaint. Plaintiff's counsel indicated that Plaintiff does not oppose this request.

12 7. This motion is filed before the response to the complaint is due and is filed in
13 good faith and not for the purpose of unwarranted delay.

14 WHEREFORE, the Plan respectfully requests that the Court issue an order granting the
15 Plan until July 18, 2017, to answer or otherwise respond to Plaintiff's complaint.

16 DATED: July 6, 2017

17 LANE POWELL PC

18 By s/ David W. Howenstine
19 D. Michael Reilly, WSBA No. 14674
20 reillym@lanepowell.com
David W. Howenstine, WSBA No. 41216
21 howenstined@lanepowell.com

22 SEYFARTH SHAW LLP

23 By s/ Shelley R. Hebert
24 Amanda A. Sonneborn, *Pro Hac Vice*
asonneborn@seyfarth.com
25 Shelley R. Hebert, *Pro Hac Vice*
shebert@seyfarth.com

26 Attorneys for Defendants The Prudential
27 Insurance Company of America and Microsoft
Corporation Welfare Plan

UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR
OTHERWISE RESPOND TO COMPLAINT

(No. 2:17-cv-00769-JLR) - 2

119219.0022/7010345.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107

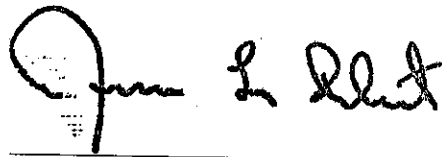
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ORDER

Having reviewed the unopposed motion for extension of time to answer or otherwise respond to the complaint, the Court hereby GRANTS the motion and ORDERS that Microsoft Corporation Welfare Plan's deadline to answer or otherwise respond to the complaint is extended until July 18, 2017.

IT IS SO ORDERED.

DATED this 7th day of July, 2017.



Honorable James L. Robart
United States District Court Judge

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CERTIFICATE OF SERVICE

Pursuant to RCW 9A.72.085, the undersigned certifies under penalty of perjury under the laws of the State of Washington that, on the date listed below, the document attached hereto was presented to the Clerk of the Court for filing and uploading to the CM/ECF system. In accordance with their ECF registration agreement and the Court's rules, the Clerk of the Court will send e-mail notification of such filing to the following persons:

Steven P. Krafchick
Krafchick Law Firm
300 South Tower
100 W Harrison
Seattle, WA 98119-4192
klf@krafchick.com

Executed on the 6th day of July, 2017, at Seattle, Washington.

s/ Lou Rosenkranz
Lou Rosenkranz, Legal Assistant