19TH JUDICIAL DISTRICT COURT FOR THE PARISH OF EAST BATON ROUGE STATE OF LOUISIANA

NO.: 651,069

SECTION 22

JAMES J. DONELON, COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA, IN HIS CAPACITY AS REHABILITATOR OF LOUISIANA HEALTH COOPERATIVE, INC.

VERSUS

TERRY S. SHILLING, GEORGE G. CROMER, WARNER L. THOMAS, IV, WILLIAM A. OLIVER, CHARLES D. CALVI, PATRICK C. POWERS, CGI TECHNOLOGIES AND SOLUTIONS, INC., GROUP RESOURCES INCORPORATED, BEAM PARTNERS, LLC, MILLIMAN, INC., BUCK CONSULTANTS, LLC, AND TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA

FILED:		
•	DEPUTY CLERK	

CONSENT MOTION FOR EXTENSION OF TIME TO PLEAD

NOW INTO COURT, through undersigned counsel, comes Defendant, Buck Consultants, LLC (hereinafter "Buck"), to move the Court for an additional twenty (20) days, through and including January 23, 2017, within which to answer, except, or otherwise plead to the First Supplemental, Amending and Restated Petition for Damages and Request for Jury Trial (hereinafter "Amended Petition") filed by Plaintiff, James J. Donelon (hereinafter "Plaintiff"). In support of this motion, Buck respectfully represents:

1.

Buck was served with the Petition by certified mail on December 2, 2016.

2.

Undersigned counsel has recently been retained to represent Buck in this matter.

3.

Undersigned counsel is seeking an additional twenty (20) days within which to respond to the Amended Petition, through and including January 23, 2017. Counsel for Plaintiff has consented to this extension. See Email dated December 19, 2016, attached hereto as Exhibit "A."

4.

Buck has not obtained any other extension in this litigation.

5,

Granting this motion will not unduly retard or delay this matter.

WHEREFORE, Defendant, Buck Consultants, LLC, respectfully requests an additional twenty (20) days, through and including January 23, 2017, within which to respond to the Amended Petition in this matter.

Respectfully submitted,

James A. Brown (La. Bar #14101) Mirais M. Holden (La. Bar #35173) A'Dair Flynt (La. Bar #37120)

LISKOW & LEWIS

one Shell Square

701 Poydras Street, Suite 5000 New Orleans, Louisiana 70139-5099

Telephone: (504) 581-7979

Jamie D. Rhymes (La. Ber #24621) LISKOW & LEWIS 522 Harding Street P.O. Box 52008 Lafayette, LA 70505 Telephone: (337) 232-7424

Attorneys for Buck Consultants, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 21, 2016, a copy of the above and foregoing pleading has been served upon all known counsel of record by fax.

Mirais Holden

From:

James A Brown

Sent:

Wednesday, December 21, 2016 12:43 PM

To:

Mirais Holden

Subject:

FW: Pleading deadline extension for Buck Consultants, LLC - Commissioner v. Shilling,

et. al.

From: J. E. Cullens, 3r. [mailto:cullens@lawbr.net] Sent: Monday, December 19, 2016 2:12 PM

To: James A Brown Cc: Patti O. Sollie

Subject: RE: Pleading deadline extension for Buck Consultants, LLC - Commissioner v. Shilling, et. al.

No problem with an extension through January 23, 2017.

Look forward to working with you.

And, as always, please let me know if you have any questions or concerns.

Thanks,

J.Cullens

HAPPY HOLIDAYS



J. E. Cullens, Jr.

12345 Perkins Road, Building 1 Baton Rouge, LA 70810 ph 225.236.3636 fax 225.236.3650 cullens@lawbr.net www.lawbr.net

fin

HOMAS, CULLENS, L ATTORNEYS AT LAW

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From: James A Brown [mailto:jabrown@liskow.com]

Sent: Monday, December 19, 2016 1:23 PM To: J. E. Culiens, Jr. <cullens@lawbr.net>

Subject: Pleading deadline extension for Buck Consultants, LLC - Commissioner v. Shilling, et. al.

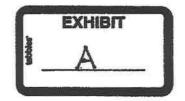
Dear Jay:

Per my voice mail left with your legal assistant, I have been retained to represent Buck Consultants, LLC in the captioned matter. Per my message, I'd like to request your client's consent to a 20 day extension, through January 23rd, for Buck Consultants, LLC to file a responsive pleading. Many thanks.

Regards,

James A Brown

(504) 556-4116 Direct (504) 556-4108 Fax (504) 473-3665 Cell



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19TH JUDICIAL DISTRICT COURT FOR THE PARISH OF EAST BATON ROUGE STATE OF LOUISIANA

NO.: 651,069

SECTION 22

JUDGE, 19TH JUDICIAL DISTRICT COURT

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VERSUS

TERRY S. SHILLING, GEORGE G. CROMER, WARNER L. THOMAS, IV, WILLIAM A. OLIVER, CHARLES D. CALVI, PATRICK C. POWERS, CGI TECHNOLOGIES AND SOLUTIONS, INC., GROUP RESOURCES INCORPORATED, BEAM PARTNERS, LLC, MILLIMAN, INC., BUCK CONSULTANTS, LLC, AND TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA

FILED:			
<u>ORDER</u>			
CONSIDERING the foregoing Consent Motion for Extension of Time to Plead, filed by			
Defendant, Buck Consultants, LLC,			
IT IS HEREBY ORDERED that the Motion is GRANTED.			
IT IS FURTHER ORDERED that Defendant, Buck Consultants, LLC, is granted an			
additional twenty (20) days, through and including January 23, 2017, within which to answer, except,			
or otherwise plead to the First Supplemental, Amending and Restated Petition for Damages and			
Request for Jury Trial, with full reservation of all rights, including the right to object to the jurisdiction			
of this Honorable Court.			
Baton Rouge, Louisiana this day of, 20			