

**STATE OF MAINE
BUREAU OF INSURANCE**

IN RE:)
)
)

APPEAL OF DISAPPROVED RATE)
FILINGS BY PROGRESSIVE)
CASUALTY INSURANCE COMPANY,)
PROGRESSIVE NORTHWESTERN)
INSURANCE COMPANY,)
PROGRESSIVE NORTHERN)
INSURANCE COMPANY, AND UNITED)
FINANCIAL CASUALTY COMPANY)

Docket No. INS-15-1001)
)
)

**APPELLANTS MOTION TO EXTEND
THE DEADLINE TO FILE DISCOVERY
RESPONSES AND OBJECTIONS AND TO
EXTEND THE DEADLINE TO RESPOND
TO THE ADVOCACY PANEL'S
OBJECTIONS**

Progressive Casualty Insurance Company, Progressive Northwestern Insurance Company, Progressive Northern Insurance Company and United Financial Casualty Company (collectively, "Progressive") moves to extend until November 3, 2015 (1) appellants deadline to file responses and objections to the Advocacy Panel's Informational Requests; and (2) appellants' deadline to file responses to the Advocacy Panel's Objections to Appellants' First Informational Requests. In support, Progressive states:

1. The Advocacy Panel provided responses and objections to Appellant's Requests for Information and served its own Requests for Information on Tuesday, October 20, 2015.
2. The Advocacy Panel has requested responses to its discovery requests "14 days after service of the inquiries" which is Tuesday, November 3, 2015. (Advocacy Panel's First Informational Requests, Instruction 9.) The Superintendent's October 8, 2015 Order governing discovery procedures requires responses within 10 days of service. Consistent with the

Advocacy Panel's requests, Appellants move to extend the deadline to respond to the Panel's Informational Requests to November 3, 2015.

3. The Superintendent's October 8, 2015 procedural order provides that a party must file a response to any objection with the Superintendent for a ruling within 5 business days of receiving that objection. The Advocacy Panel's responses to Progressive's First Informational Requests contained many objections. Due to the volume of objections, and the Appellants' desire to confer with the Advocacy Panel in an effort to resolve any discovery disputes before asking the Superintendent for a ruling, Appellants move to extend the deadline to file a response with the Superintendent to November 3, 2015.

WHEREFORE, Progressive moves to extend to November 3, 2015: (1) its deadline to file responses and objections to the Advocacy Panel's First Informational Requests and (2) its deadline to file any responses to the Advocacy Panel's objections to Appellant's Informational Requests.

Dated at Augusta, Maine this 23 day of OCTOBER.



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