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13 *Attorneys for Lisa Crist*

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15 UNITED STATES DISTRICT COURT  
16 EASTERN DISTRICT OF CALIFORNIA

17 ALLIED WORLD NATIONAL  
ASSURANCE COMPANY, a New  
18 Hampshire corporation, and ALLIED  
WORLD ASSURANCE COMPANY (U.S.)  
19 INC., a Delaware corporation,

20 Plaintiffs,

21 v.

22 SK PM CORP., a California corporation aka  
"S.K. Foods PM Corp.," SK FOODS, L.P., a  
23 California limited partnership, FREDERICK  
SCOTT SALYER, an individual,  
24 BLACKSTONE RANCH, a California  
corporation aka "Blackstone Ranch Calif 'S'  
25 Corp.," LISA CRIST, an individual, MARK  
MCCORMICK, an individual,

26 (caption continued on next page)  
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Case No. 1:10-CV-01262-OWW-JLT

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEFENDANT  
LISA CRIST TO RESPOND TO  
COMPLAINT**

**Complaint Served: 7/26/2010  
Current Response Date: 12/15/2010  
New Response Date: 1/27/2011**

1 SCOTT SALYER REVOCABLE TRUST, a  
2 trust, THE CAROLINE GAZELLE SALYER  
3 IRREVOCABLE TRUST, a trust, THE  
4 STEFANIE ANN SALYER IRREVOCABLE  
5 TRUST, a trust, SS FARMS, LLC, a California  
6 limited liability company, SK FOODS, LP  
7 401K PLAN, an ERISA plan aka "SK Foods  
8 L.P. Blackstone Ranch & SK Foods L.P. 401K  
9 Plan," SARS, LLC, a California limited  
10 liability company, CSSS LP, a California  
11 limited partnership d/b/a Central Valley  
12 Shippers, SK FOODS LLC, a Nevada limited  
13 liability company, S.K. FOODS PM CORP., an  
14 entity or a d/b/a of unknown legal capacity,  
15 SKF AVIATION, LLC, a California limited  
16 liability company, SSC FARMING, LLC, a  
17 California limited liability company, RHM  
18 INDUSTRIAL/SPECIALTY FOODS, INC., a  
19 California corporation d/b/a Colusa County  
20 Canning Company and d/b/a SK Foods –  
21 Colusa Canning, CARMEL WINE  
22 MERCHANTS LLC, a California limited  
23 liability company, CIRCLE PACIFIC LTD., a  
24 New Zealand company, SUNRISE COAST  
25 JAPAN, an entity or a d/b/a of unknown legal  
26 capacity, SSC FARMS I, LLC, a California  
27 limited liability company, SSC FARMS II,  
28 LLC, a California limited liability company,  
SK FARM SERVICES, LLC, a California  
limited liability company, SK FROZEN  
FOODS, LLC, a California limited liability  
company, SALYER AMERICAN  
INSURANCE SERVICES, a California limited  
liability company, SSC FARMS III, LLC, a  
California limited liability company, SALYER  
AMERICAN COOLING, a general  
partnership, SALYER WESTERN COOLING  
COMPANY, a general partnership, YUMA  
AMERICAN COOLING CORPORATION, an  
entity or a d/b/a of unknown legal capacity,  
SAWTOOTH COOLING, LLC, a California  
limited liability company, and SALYER  
AMERICAN FRESH FOODS, a California  
corporation,

Defendants.

1           WHEREAS, on July 14, 2010, Plaintiffs Allied World National Assurance Company and  
2 Allied World Assurance Company (U.S.) Inc. (collectively “Plaintiffs”) filed their complaint in  
3 this matter against the above-captioned defendants (the “Complaint”);

4           WHEREAS, on July 26, 2010, Plaintiffs served the summons and Complaint on defendant  
5 Lisa Crist;

6           WHEREAS, this Court previously extended the time for Lisa Crist to respond to the  
7 Complaint, pursuant to the parties’ stipulations, on September 15, 2010 and October 29, 2010  
8 (Docket Nos. 26 and 33);

9           WHEREAS, the current deadline for Lisa Crist to respond to the Complaint is December  
10 15, 2010;

11           WHEREAS, the parties continue to believe that this matter may be resolved as between  
12 Plaintiffs and Lisa Crist without the necessity of Lisa Crist filing a responsive pleading, and are  
13 working towards this goal. For this reason, the Lisa Crist and Plaintiffs believe that good cause  
14 exists to extend the deadline for Lisa Crist to respond to the Complaint until January 27, 2011;

15           WHEREAS, there are currently two motions to dismiss counterclaims filed by certain  
16 defendants against Plaintiffs that are set to be heard on February 7, 2011, and the Initial  
17 Scheduling Conference is set for March 25, 2011. Thus, the parties do not believe that this  
18 extension will impact the timely progression of this action.

19           NOW THEREFORE, Plaintiffs and Lisa Crist, through counsel, hereby agree and  
20 stipulate, subject to the Court’s approval, to extend the time for Lisa Crist to respond to the  
21 Complaint to January 27, 2011;

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1 Dated: December 15, 2010

TROUTMAN SANDERS LLP

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By: Peter R. Lucier

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Terrence R. McInnis

Kevin F. Kieffer

Peter R. Lucier

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*Attorneys for Plaintiffs Allied World National*

*Assurance Company and Allied World*

*Assurance Company (U.S.) Inc.*

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8 Dated: December 15, 2010

DUANE MORRIS LLP

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By: Stephen H. Sutro (as authorized 12/15/2010)

Stephen H. Sutro

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*Attorneys for Lisa Crist*

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### CERTIFICATION

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Pursuant to Local Rule 131(e), I, PETER R. LUCIER, certify that on December 15, 2010

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Stephen H. Sutro authorized me to submit this Stipulation and Order to Extend Time for

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Defendant Lisa Crist to Respond to Complaint on his behalf.

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### ORDER

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IT IS SO ORDERED.

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Dated: December 15, 2010

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/s/ Oliver W. Wanger

UNITED STATES DISTRICT JUDGE

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