1 2 3 4 5 6	JODY L. WINTER, #249592 LLOYD WINTER, P.C. 1713 Tulare Street, #122 Fresno, CA 93721 Telephone: (559) 233-3636 Facsimile: (559) 579-1530 jwinter@lloydwinterlaw.com Attorneys for defendants Eric Hirschfield individual, and James Winter, an individual	
8	UNITED STATES DISTRICT COURT	
9	EASTERN DISTRICT OF CALIFORNIA	
10		
11	WESTCHESTER SURPLUS LINES	CASE NO. 1:13-cv-00383-LJO-BAM
12	INSURANCE COMPANY	STIPULATION TO EXTEND TIME TO
13	Plaintiff,	FILE ANSWER; ORDER THEREON
14	V.	
15	STRONGTOWER FINANCIAL INC.,	
16	a California corporation; DEANNA	
17	L. BUCHHOLZ, an individual; ERIC HIRSFIELD, an individual; JAMES	
18	WINTER, an individual; KATHERINE S. WESTLAKE, an individual;	
19	RAYMOND K. JONES, an individual;	
20	ANA GONZALEZ, an individual and Trustee of Gonzalez Trust UAD	
21	5-29-07 and Estate of Cesar T.	
22	Gonzalez; VICTOR MICHELS, an individual; JEFFREY S. RAYNES, an	
23	individual and as Trustee of the Jeffrey	
24	S. Raynes Defined Benefit and 401K Profit Sharing Plan and Trust; RANDI	
25	ARMSTRONG, an individual, AND KATHLEEN A. GARRETT, an	
26	Individual; and DOES 1-250,	
27	Defendants.	
28		

MOTION AND STIPULATION TO EXTEND TIME TO FILE ANSWER

1	IT IS HEREBY STIPULATED pursuant to local rule (E.D. Cal. L.R. 144(a)) by	
2	and between plaintiff Westchester Surplus Lines Insurance Company, by and through	
3	their attorney of record, London Fischer, LLP, and defendants Eric Hirschfield and	
4	James Winter, by and through their attorney of record Lloyd Winter, P.C., to extend the	
5	time in which to file an answer or responsive motion to the complaint for interpleader for	
6	36 days up to and including Tuesday, July 23, 2013.	
7	These stipulating parties are engaged in settlement discussions and hereby request	
8	additional time to continue those discussions before these stipulating defendants must	
9	answer or respond to the complaint in this matter. Currently, the response of stipulating	
10	defendants is due on Monday, June 17, 2013.	
11	These stipulating parties have one previous extension of 28 days pursuant to Local	
12	Rule 144(a), and hereby move and request the Court's approval of this additional	
13	extension pursuant to Local Rule 144(a), (b), and (d).	
14		
15	Dated: June 13, 2013	LONDON FISCHER LLP, a
16		limited liability partnership
17		To the state of th
18		By: Richard S. Endres,
19		Attorney for plaintiff, Westchester Surplus Lines Insurance Company
20		
21	Dated: June 13, 2013	LLOYD WINTER, a
22		professional corporation
23		_
24		By: Jody L. Winter,
25		Attorney for defendants Eric Hirschfield and James Winter
26	////	
27	////	
28		-1-
		MOTION AND STIPULATION TO EXTEND TIME TO FILE ANSWER

ORDER The above Stipulation of the parties is APPROVED. Defendants Eric Hirschfield and James Winter shall have up to and including July 23, 2013, to respond to Plaintiff's Complaint. IT IS SO ORDERED. Dated: **June 14, 2013** -2-MOTION AND STIPULATION TO EXTEND TIME TO FILE ANSWER