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9 Attorneys for Defendants

10 CHARTIS SPECIALTY INSURANCE COMPANY fka AMERICAN INTERNATIONAL
11 SPECIALTY LINES INSURANCE COMPANY and NATIONAL UNION FIRE INSURANCE
12 COMPANY

13 **UNITED STATES DISTRICT COURT**

14 **EASTERN DISTRICT OF CALIFORNIA**

15 TRAVELERS PROPERTY CASUALTY
16 COMPANY OF AMERICA, a Connecticut
17 corporation,

18 Plaintiff,

19 v.

20 OLD REPUBLIC INSURANCE
21 COMPANY, a Pennsylvania corporation; et
22 al; and DOES 1 through 10 inclusive,

23 Defendants.

Case No. 1:13-cv-00576-LJO-BAM

**STIPULATION AND ORDER TO EXTEND
TIME TO FILE A RESPONSIVE
PLEADING**

(Doc. 27)

24 This Stipulation is entered into by and between Plaintiff TRAVELERS PROPERTY
25 CASUALTY COMPANY OF AMERICA ("Travelers") and Defendant NATIONAL UNION
26 FIRE INSURANCE COMPANY ("National Union") by and through their respective attorneys' of
27 record.

RECITALS

28 1. WHEREAS Travelers filed its complaint in the instant action on April 19, 2013;
2. WHEREAS Travelers served National Union on May 9, 2013 with the summons
and complaint in this action;

1 3. WHEREAS Travelers and National Union have agreed to an extension for National
2 Union to respond to the complaint;

3 **IT IS HEREBY STIPULATED AND AGREED:**

4 4. Subject to the Court's approval, National Union shall file a responsive pleading to
5 the complaint on or before June 13, 2013.

6 5. This stipulation shall not constitute an appearance by National Union. National
7 Union does not waive its right to challenge the Court's jurisdiction over this matter and/or whether
8 National Union was validly served with summons and complaint.

9
10 DATED: May 31, 2013

HEROLD & SAGER

11 */s/ Andrew Herold*

12 _____
13 ANDREW D. HEROLD, ESQ.

14 Attorneys for Defendants

15 Chartis Specialty Insurance Company and National
16 Union Fire Insurance Company

17 DATED: May 31, 2013

THE AGUILERA LAW GROUP, APLC

18 */s/ Angela Martin (as authorized 5-31-13)*

19 _____
20 A. ERIC AGUILERA

21 KARI M. MYRON

22 ANGELA MARTIN

23 Attorneys for Plaintiff

24 TRAVELERS PROPERTY

25 CASUALTY COMPANY OF AMERICA
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27
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ORDER

On May 31, 2013, Plaintiff and Defendant National Union stipulated to extend Defendants' time to file an answer or otherwise respond to Plaintiff's Complaint. (Doc. 27). The Stipulation of the parties is APPROVED. Defendant National Union shall have up to an including June 13, 2013 to answer or otherwise respond to Plaintiff's Complaint.

IT IS SO ORDERED.

Dated: June 4, 2013

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE