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Attorneys for Defendants

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

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

TRAVELERS PROPERTY CASUALTY
COMPANY OF AMERICA, a Connecticut
corporation.

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

Plaintiff.

V.

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

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

(Doc. 27)

Defendants.

This Stipulation is entered into by and between Plaintiff TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA (“Travelers”) and Defendant NATIONAL UNION FIRE INSURANCE COMPANY (“National Union”) by and through their respective attorneys’ of record.

RECITALS

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;

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.

10 | DATED: May 31, 2013

HEROLD & SAGER

/s/ Andrew Herold

ANDREW D. HEROLD, ESQ.
Attorneys for Defendants
Chartis Specialty Insurance Company and National
Union Fire Insurance Company

16 | DATED: May 31, 2013

THE AGUILERA LAW GROUP, APLC

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

A. ERIC AGUILERA
KARI M. MYRON
ANGELA MARTIN
Attorneys for Plaintiff
TRAVELERS PROPERTY
CASUALTY COMPANY OF AMERICA

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 and 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