1	MATTHEW A. ARIGO [SBN 254871] BONETATI & KINCAID, INC.		
2	2020 North Tustin Avenue Santa Ana, California 92705		
3	(714) 466-6600 phone (714) 466-6601 fax		
4	Attorneys for Defendant		
5	UNDEŘWRITERS AT LLOYD'S LONDON		
6			
7	UNITED STATES DISTRICT COURT		
8	EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION		
9			
10	TRAVELERS PROPERTY CASUALTY	CASE NO.: 1:13-cv-00576-LJO-BAM	
11 12	COMPANY OF AMERICA,		
12	Plaintiff,	ORDER RE: STIPULATION TO EXTEND	
14	vs.	TIME TO RESPOND TO THE COMPLAINT	
15	OLD REPUBLIC INSURANCE COMPANY,	[Local Rule 144(a)]	
16	a Pennsylvania corporation; EVERETT) INDEMNITY INSURANCE COMPANY, a) Delaware corporation; INTERSTATE FIRE &)	Current Response Dates: 5/30/13 & 6/3/13	
17	CASUALTY COMPANY, an Illinois corporation; FINANCIAL PACIFIC	New Response Date: 6/18/13	
18	INSURANCE COMPANY, a California corporation; ARCH SPECIALTY		
19	INSURANCE COMPANY, a Nebraska corporation; NAVIGATORS SPECIALTY		
20	INSURANCE COMPANY, a New York corporation; CLARENDON NATIONAL		
21	INSURANCE COMPANY, a New Jersey corporation; ACE AMERICAN INSURANCE		
22 23	COMPANY, fka ALLIED INSURANCE COMPANY, a Pennsylvania corporation;		
23 24	NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, a North Dakota corporation; FIRST SPECIALTY		
25	INSURANCE CORPORATION, a Missouri corporation; SPECIALTY INSURANCE		
26	COMPANY, an Arizona corporation; AMERICAN SAFETY INDEMNITY		
27	COMPANY, an Oklahoma corporation, LEXINGTON INSURANCE COMPANY, a		
28	Delaware corporation; PROBUILDERS SPECIALTY INSURANCE COMPANY,		
	ORDER RE: STIPULATION TO	EXTEND TIME TO RESPOND	
	TO THE COMPLAINT		

1	RRG, a Washington, D.C. corporation;) SECURITY AMERICAN RISK RETENTION)			
2	GROUP, a Vermont corporation; ILLINOIS) UNION INSURANCE COMPANY, an)			
3	Illinois corporation; ZURICH NORTH) AMERICAN INSURANCE COMPANY, a)			
4	New York corporation; LIBERTY MUTUAL) INSURANCE COMPANY, a Massachusetts)			
5	corporation; NORTHERN INSURANCE) COMPANY OF NEW YORK, a New York)			
6	corporation; LIBERTY MUTUAL)			
7	INSURANCE COMPANY, a Massachusetts) corporation; NORTHERN INSURANCE)			
8	COMPANY OF NEW YORK, a New York) corporation; CHARTIS SPECIALTY)			
	INSURANCE COMPANY fka AMERICAN) INTERNATIONAL SPECIALTY LINES)			
9	INSURANCE COMPANY, an Illinois) corporation; NAVIGATORS INSURANCE)			
10	COMPANY, a New York corporation;) TRUCK INSURANCE EXCHANGE, a)			
11	California corporation; CERTAIN) UNDERWRITERS AT LLOYD'S LONDON,)			
12	a Kentucky corporation; PRAETORIAN) INSURANCE COMPANY, a Pennsylvania)			
13	corporation and DOES 1 through 10, inclusive.)			
14	Defendants.)			
15)			
16	Plaintiff Travelers Property Casualty Company of America ("Travelers") and			
17	Defendant UNDERWRITERS AT LLOYD'S LONDON ("Underwriters"), by and through			
18	their counsel and pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule			
19 20	144(a), hereby stipulate to an 28-day extension of time to respond to Travelers' Complaint in			
21	this matter.			
22	Travelers filed this action on April 19, 2013. Underwriters was served with the			
23	Complaint on May 9, 2013. Pursuant to Federal Rules of Civil Procedure Rule 12(a)(1)(A)(i),			
24	Underwriters is required to respond to the Complaint on or before May 30, 2013. Pursuant to			
25	Eastern District Local Rule 144(a), the Parties stipulate and agree to extend these dates for 28-			
26	days to June 28, 2013. Good cause exists for this extension to allow Underwriters time to			
27				
28	obtain their policies and claim files, if any, prior to responding to the Complaint. There have			
	2 ORDER RE: STIPULATION TO EXTEND TIME TO RESPOND			
	TO THE COMPLAINT			

1	been no prior extensions of time for Underwriters to respond to the Complaint, and because		
2	the Complaint was recently filed, there appears to be no prejudice extending the time for		
3	Underwriters to respond to the Complaint.		
4	WHEREFORE, for the foregoing reasons, the parties stipulate that Underwriters shall		
5	have up to and including June 28, 2013 to answer or otherwise respond to Travelers'		
6	Complaint.		
7	IT IS SO STIPULATED.		
8	Dated: May 30, 2013	THE AGUILERA LAW GROUP, APLC	
9			
10 11		By: <u>/s/ Angela Martin as approved on 5/30/13</u> KARI M. MYRON	
12		ANGELA MARTIN Attorneys for Plaintiff TRAVELERS	
13		PROPERTY CASUALTY COMPANY OF AMERICA	
14		OF AMERICA	
15	Dated: May 30, 2013	BONETATI & KINCAID, INC.	
16	Dated. 101ay 50, 2015	bondinin a kinemi, inc.	
17		By: <u>/s/ Matthew A. Arigo as approved on 5/30/13</u> MATTHEW A. ARIGO	
18		Attorneys for Defendant	
19		UNDERWRITERS AT LLOYD'S LONDON	
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21 22	IT IS SO ORDERED.		
22	Dated: June 4, 2013	/s/ Barbara A. McAuliffe	
24		UNITED STATES MAGISTRATE JUDGE	
25			
26			
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28			
		3 ON TO EXTEND TIME TO RESPOND	
	TO THE COMPLAINT		