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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA *ex rel*  
KARCHER INSULATION, INC., a California  
corporation,

Plaintiff,

v.

SOLPAC CONSTRUCTION INC., a California  
corporation doing business as SOLTEK  
PACIFIC CONSTRUCTION COMPANY;  
SAFECO INSURANCE COMPANY, a New  
Hampshire corporation; R.J. LANTHIER CO.,  
INC., a California corporation; and DOES 1  
through 15, inclusive,

Defendants.

Case No. 1:14-cv-00323-LJO-SAB

**STIPULATION AND ORDER TO FILE  
ANSWER(S) TO FIRST AMENDED  
COMPLAINT OF KARCHER  
INSULATION, INC.**

Plaintiff KARCHER INSULATION, INC. (“Plaintiff”) and Defendants SOLPAC  
CONSTRUCTION, INC. dba SOLTEK PACIFIC CONSTRUCTION CO. (“SOLTEK”) and  
SAFECOINSURANCE COMPANY OF AMERICA (“SAFECO”) (collectively referenced  
herein as “Defendants”) hereby agree and stipulate as follows:

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1 **RECITALS**

2 WHEREAS Plaintiff filed the original Complaint in the United States District Court,  
3 Eastern District of California, Case No. 1:14-CV-00323-LJO-SAB (hereinafter "Complaint") on  
4 March 7, 2014;

5 WHEREAS SAFECO filed an Answer to the Complaint on March 27, 2014;

6 WHEREAS SOLTEK filed an Answer to the Complaint on April 3, 2014;

7 WHEREAS Plaintiff filed a First Amended Complaint against Defendants on June 10,  
8 2014;

9 WHEREAS former counsel for Defendants passed away the weekend of July 4, 2014;

10 WHEREAS Defendants have retained new counsel, acknowledged as attorney of record  
11 for Defendants on October 7, 2014; and

12 WHEREAS Defendants desire to file Answers to the First Amended Complaint, true and  
13 correct copies of which are attached hereto as Exhibits A and B, respectively.

14 IT IS HEREBY STIPULATED by and between the Parties, through their respective  
15 attorneys of record, that Defendants be permitted to file the proposed Answers to the First  
16 Amended Complaint.

17 Dated: October 13, 2014

LANG, RICHERT & PATCH, P.C.

19 By: /s/ Matthew W. Quall

20 Matthew W. Quall  
21 Attorneys for Defendants  
22 SOLPAC CONSTRUCTION, INC. dba  
23 SOLTEK PACIFIC CONSTRUCTION CO.  
and SAFECO INSURANCE COMPANY  
OF AMERICA

24 Dated: October 7, 2014

LAW OFFICE OF DONNA KIRKNER

26 By: /s/ Donna Kirkner

27 Donna Kirkner  
Attorneys for Plaintiff  
KARCHER INSULATION, INC.

1 **ORDER**

2 This Court, having read and considered the Stipulation to file Answers by SOLPAC  
3 CONSTRUCTION, INC. dba SOLTEK PACIFIC CONSTRUCTION CO. and SAFECO  
4 INSURANCE COMPANY OF AMERICA to the First Amended Complaint, finds that good  
5 cause exists to allow Defendants to file their respective Answers to Plaintiff's First Amended  
6 Complaint.  
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10 IT IS SO ORDERED.

11 Dated: October 14, 2014

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UNITED STATES MAGISTRATE JUDGE