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THE STANDARD INSURANCE COMPANY,
7 an Oregon Corporation; THE STANDARD
INSURANCE COMPANY, an Oregon Corporation
8 as administrator of the CALIFORNIA TEACHERS
ASSOCIATION ECONOMICS BENEFITS
9 TRUST GROUP DISABILITY POLICY

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14 YVETTE L. JAQUISH

15
16 UNITED STATES DISTRICT COURT

17 EASTERN DISTRICT OF CALIFORNIA – FRESNO

18 YVETTE L. JAQUISH, an individual,) Case No. 1:18-cv-00087-LJO-SKO
19)
Plaintiff,)
20) **SECOND JOINT STIPULATION TO**
vs.) **EXTEND TIME TO RESPOND TO**
21) **COMPLAINT (L.R. 144(A)); ORDER**
THE STANDARD INSURANCE COMPANY,) **ON STIPULATION**
22)
an Oregon Corporation; THE STANDARD)
INSURANCE COMPANY, an Oregon) Complaint Filed: 1/18/2018
23 Corporation as administrator of the)
CALIFORNIA TEACHERS ASSOCIATION) (Doc. 9)
24 ECONOMICS BENEFITS TRUST GROUP)
DISABILITY POLICY and DOES 1 through 100,)
25)
Defendants.)
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1 TO THE HONORABLE COURT:

2 The parties hereto, Plaintiff YVETTE L. JAQUISH (“Plaintiff”) and Defendant THE
3 STANDARD INSURANCE COMPANY an Oregon Corporation; THE STANDARD
4 INSURANCE COMPANY, an Oregon Corporation as administrator of the CALIFORNIA
5 TEACHERS ASSOCIATION ECONOMICS BENEFITS TRUST GROUP DISABILITY
6 POLICY (“Defendants”), by and through their respective counsel of record, hereby stipulate as
7 follows:

8 WHEREAS, Plaintiff filed her Complaint in this Court on January 18, 2018.

9 WHEREAS, Plaintiff served the Complaint onto Defendants on January 23, 2018.

10 WHEREAS, the parties have entered into a previous Stipulation to Extend Time to
11 Respond to Complaint on February 2, 2018.

12 WHEREAS, Defendants’ current deadline to file a response to the Complaint is
13 February 27, 2018.

14 WHEREAS, Defendants have requested an extension of an additional 14 days, or until
15 March 13, 2018, to respond to the Complaint in order to permit sufficient time to prepare a
16 response.

17 WHEREAS, Plaintiff and Defendants do not anticipate that this extension of time will
18 alter the date of any event or any deadline already fixed by Court order.

19 IT IS HEREBY STIPULATED by and between Plaintiff and Defendants through their
20 respective counsel of record that the deadline for Defendants to respond is extended up to
21 March 13, 2018.

22 IT IS SO STIPULATED.

23 Dated: February 27, 2018

KRASE, BAILEY, REED-KRASE, LLP

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By /s/ Alexander Reed-Krase
Allan Bailey
Alexander Reed-Krase
Attorneys for Plaintiff
YVETTE L. JAQUISH

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Dated: February 27, 2018

GORDON REES SCULLY MANSUKHANI LLP

By /s/ Jordan S. Altura
Jordan S. Altura
Tino X. Do
Attorneys for Defendants
THE STANDARD INSURANCE COMPANY an
Oregon Corporation; THE STANDARD
INSURANCE COMPANY, an Oregon Corporation
as administrator of the CALIFORNIA TEACHERS
ASSOCIATION ECONOMICS BENEFITS
TRUST GROUP DISABILITY POLICY

ATTESTATION OF E-FILED SIGNATURE

I, Jordan S. Altura, am the ECF user whose ID and password are being used to file this Second Joint Stipulation to Extend Time to Respond to Complaint. In compliance with Local Rule 5-1(i), I hereby attest that Alexander Reed-Krase, counsel for Plaintiff, has concurred in this filing.

Dated: February 27, 2018

/s/ Jordan S. Altura
Jordan S. Altura

ORDER

Pursuant to the parties' above stipulation to extend the time for Defendants The Standard Insurance Company an Oregon Corporation, and The Standard Insurance Company, an Oregon Corporation as administrator of the California Teachers Association Economics Benefits Trust Group Disability Policy (collectively "Defendants") to respond to the complaint (Doc. 9), and for good cause shown, IT IS ORDERED that the deadline for Defendants to respond to the complaint is hereby extended from February 27, 2018, through March 13, 2018.

IT IS SO ORDERED.

Dated: March 1, 2018

/s/ Sheila K. Olerto
UNITED STATES MAGISTRATE JUDGE