ALLSTATE INDEMNITY COMPANY, an Illinois corporation, ALLSTATE INSURANCE COMPANY, an Illinois

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Place: Courtroom 4, 15th Floor Judge: Hon. Lawrence K. Karlton

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| 1 2 | corporation, ALLSTATE PROPERTY AND CASUALTY INSURANCE COMPANY, an Illinois corporation; and DOES 1 through 100, inclusive, | | |
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| 3 4 | Defendants. | | |
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| 6 | Plaintiff Robert Watts and Defendants Allstate, by and through their respective counsel of record, hereby stipulate and agree as follows: | | |
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| | WHEREAS, the Court entered judgment in the present action on May 12, 2011 against | | |
| 8 | Robert Watts; | | |
| 9 | WHEREAS, Defendants filed a Bill of Costs on May 26, 2011 pursuant to Local Rule 292; | | |
| 10 | WHEREAS, Plaintiff will file objections to Defendants' Bill of Costs; | | |
| 11 | WHEREAS, the parties entered into a stipulation to extend Plaintiff's deadline to file his | | |
| 12 | objections and motion to tax costs on September 15, 2011; | | |
| 13 | WHEREAS, this Court signed the stipulation on July 18, 2011 extending Plaintiff's deadline | | |
| 14 | to September 15, 2011; | | |
| 15 | WHEREAS, Defendants do not oppose Plaintiff's request that the Court extend Plaintiff's | | |
| 16 | deadline(s) to file said objections and/or motion until 30 days after the Court's Order on Plaintiff's | | |
| 17 18 | Rule 59(a) and Rule 60 Motions; | | |
| 19 | WHEREAS, Federal Rule of Civil Procedure Rule 6(b) allows the Court to extend time, for | | |
| 20 | good cause, if the request to extend time is made before the original time expires; | | |
| | IT IS HEREBY STIPULATED that, with the Court's approval, Plaintiff may object to | | |
| 21 22 | Defendants' Bill of Costs and file a motion to tax costs up to and including 30 days after the Court's | | |
| 23 | Order on Plaintiff's Rule 59(a) and Rule 60 Motions. | | |
| 23 | IT IS SO STIPULATED. | | |
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| 20 | -2- STIPULATION AND [PROPOSED] ORDER TO EXTEND PLAINTIFF'S DEADLINE TO FILE OBJECTIONS AND MOTION TO TAX COSTS | | |

| 1 | | Respectfully submitted, |
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| 2 | Dated: September 14, 2011 | YORK LAW CORPORATION |
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| 5 | | By: /s/ WENDY C. YORK |
| 6 | | JENNIFER B. EULER Attorneys for Plaintiff ROBERT WATTS |
| 7 | Dated: September 14, 2011 | SONNENSCHEIN NATH & ROSENTHAL LLP |
| 8 | | |
| 9 | | Devlat |
| 10 | | By <u>/s/</u> SONIA MARTIN |
| 11 | | Attorneys for Attorneys for Defendants ALLSTATE INDEMNITY COMPANY, |
| 12 | | ALLSTATE INSURANCE COMPANY, and ALLSTATE PROPERTY AND CASUALTY |
| 13 | | INSURANCE COMPANY |
| 14 | IT IS SO ORDERED. | |
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| 16 | Dated: September 15, 2011 | |
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| 18 | | James K Karlton |
| 19 | | LAWRENCE K. KARLTON |
| 20 | | SENIOR JUDGE UNITED STATES DISTRICT COURT |
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