

1 CANDICE L. FIELDS, SBN 172174
 2 CANDICE FIELDS LAW
 3 455 Capitol Mall, Suite 350
 4 Sacramento, California 95814
 Telephone: (916) 414-8050
 Facsimile: (916) 790-9450
 cfields@candicefieldslaw.com

5 Attorneys for Defendant INGERLISHA MARTINEZ,
 6 as mother and next friend of the minor child A.M.

7
 8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

10
 11 THE PRUDENTIAL INSURANCE
 COMPANY OF AMERICA,

12 Plaintiff,

13 v.

14 A.M, a minor; D.P., a minor; ANDREA
 15 MORGAN in her personal capacity;
 16 INGERLISHA MARTINEZ, as mother and
 17 next friend of the minor child A.M.; and
 ANDREA MORGAN, in her capacity as
 mother and next friend of the minor child
 D.P.;

18 Defendants.

No. 2:13-cv-00820-MCE-AC

**JOINT REQUEST TO EXTEND
 DEADLINE FOR DEFENDANT
 MORGAN'S DEADLINE TO FILE A
 RESPONSE TO PLAINTIFF'S
 COMPLAINT; ORDER**

19
 20
 21
 22 Plaintiff, The Prudential Insurance Company Of America ("Plaintiff"), Defendant
 23 Ingerlisha Martinez, as mother and next friend of the minor child A.M. ("Defendant
 24 Martinez), and Defendant Andrea Morgan ("Defendant Morgan") on her own behalf
 25 (collectively "the parties"), through their respective attorneys, hereby stipulate as follows:

26 WHEREAS, on April 26, 2013, Plaintiff filed an Interpleader Complaint naming the
 27 Defendant Martinez, as mother and next friend of the minor child A.M., as a
 28 Defendant/Claimant. (ECF 1.)

1 WHEREAS, the Interpleader Complaint names Andrea Morgan, both in her personal
2 capacity, and in her capacity as mother and next friend of the minor child D.P., as a
3 Defendant/Claimant (“Defendant Morgan”).

4 WHEREAS, the Interpleader Complaint names Defendant Martinez, only in her
5 capacity as mother and next friend of the minor child A.M., as a defendant.

6 WHEREAS, on July 1, 2013, Defendant Martinez, as mother and next friend of the
7 minor child A.M., filed an Answer to the Interpleader Complaint. (ECF 14.)

8 WHEREAS, Plaintiff and Defendant Morgan stipulated to an extension permitting
9 Defendant Morgan to file a Response to the Interpleader Complaint on or before September
10 24, 2013. (ECF 17.)

11 WHEREAS, on September 25, 2013, Defendant Morgan contacted the parties to
12 communicate her intent to waive her personal claim to the insurance proceeds at issue in
13 this action.

14 WHEREAS, the parties jointly obtained an extension from the Court permitting
15 Defendant Morgan to file a Response to the Interpleader Complaint on or before November
16 1, 2013. (ECF 21.)

17 WHEREAS, the parties are actively preparing the documents necessary to 1) settle
18 the action as to Defendant Morgan, 2) move for the appointment of guardians ad litem for
19 the minor children A.M. and D.P., and 3) settle the entire action subject to the court’s
20 approval.

21 WHEREAS, the parties jointly request that the deadline for Defendant Morgan be
22 further extended to permit the parties to complete the preparation of the above-referenced
23 documents.

24 The undersigned parties therefore jointly request that the deadline for Defendant
25 Morgan to file a response to the Interpleader Complaint be extended to December 6, 2013.

26
27 ///

28 ///

1 Dated: October 24, 2013

MILLER LAW GROUP

2 By: /s/Jennifer A. Shy
3 JENNIFER A. SHY
4 Attorneys for Plaintiff
5 THE PRUDENTIAL INSURANCE
6 COMPANY

7 Dated: October 24, 2013

CANDICE FIELDS LAW

8 By: /s/ Candice L. Fields
9 CANDICE L. FIELDS
10 Attorney for Defendant INGERLISHA
11 MARTINEZ, As Mother And Next
12 Friend Of The Minor Child A.M.


13 Dated: October 24, 2013

14 By: /s/ Andrea Morgan
15 ANDREA MORGAN
16 In Pro Per
17 (Original Signature Retained By
18 Attorney Candice L. Fields)

19 **ORDER**

20 Based on the reasons set forth in the Joint Request of the parties filed on October
21 30, 2013, and good cause appearing therefrom, the Court grants the Request of the parties
22 in its entirety. IT IS HEREBY ORDERED that the deadline for Defendant Andrea Morgan to
23 file a Response to the Interpleader Complaint is extended from November 1, 2013 to
24 December 6, 2013.

25 Dated: November 5, 2013

26 
27 MORRISON C. ENGLAND, JR., CHIEF JUDGE
28 UNITED STATES DISTRICT COURT