

1 Jennifer A. Shy (SBN 131065)
 2 jas@millerlawgroup.com
 3 MILLER LAW GROUP
 4 A Professional Corporation
 5 111 Sutter Street, Suite 700
 6 San Francisco, CA 94104
 7 Tel. (415) 464-4300
 8 Fax (415) 464-4336

9 Attorneys for Plaintiff
 10 THE PRUDENTIAL INSURANCE
 11 COMPANY OF AMERICA

12 CANDICE L. FIELDS (SBN 172174)
 13 CANDICE FIELDS LAW
 14 cfields@candicefieldslaw.com
 15 455 Capitol Mall, Suite 350
 16 Sacramento, California 95814
 17 Telephone: (916) 414-8050
 18 Facsimile: (916) 790-9450

19 Attorneys for Defendant
 20 INGERLISHA MARTINEZ, as mother
 21 and next friend of the minor child A.M.

22 UNITED STATES DISTRICT COURT
 23 FOR THE EASTERN DISTRICT OF CALIFORNIA
 24 SACRAMENTO DIVISION

25 THE PRUDENTIAL INSURANCE COMPANY
 26 OF AMERICA,

27 Plaintiff,

28 v.

29 A.M, a minor; D.P., a minor; ANDREA
 30 MORGAN in her personal capacity;
 31 INGERLISHA MARTINEZ, as mother and next
 32 friend of the minor child A.M.; and ANDREA
 33 MORGAN, in her capacity as mother and next
 34 friend of the minor child D.P.;

35 Defendants.

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

**JOINT REQUEST FOR FURTHER
 EXTENSION OF TIME FOR ANDREA
 MORGAN TO FILE A RESPONSE TO
 COMPLAINT; ORDER**

Complaint Filed: April 26, 2013

1 Pursuant to LR 144(d), Plaintiff The Prudential Insurance Company of America
2 (“Plaintiff”), by and through its undersigned attorneys, and Defendant Ingerlisha Martinez, as
3 mother and next friend of the minor child A.M. (“Martinez”), by and through her undersigned
4 attorneys (collectively “the parties”), hereby stipulate as follows:

5
6 WHEREAS, on April 26, 2013, Plaintiff filed an Interpleader Complaint.

7
8 WHEREAS, on July 1, 2013, Defendant Martinez, as mother and next friend of
9 the minor child A.M., filed an Answer to the Interpleader Complaint. (Docket No. 14.)

10
11 WHEREAS, the parties jointly obtained an extension from the Court permitting
12 Defendant Andrea Morgan (“Morgan”) to file a Response to the Interpleader Complaint on
13 or before January 17, 2014. (Docket Nos. 17, 21 & 28.)

14
15 WHEREAS, the parties are finalizing a Joint Motion to Appoint Andrea Morgan
16 as Guardian *Ad Litem* for the Minor, D.P., Approve Minor Settlement and Enter Judgment
17 that will be filed within thirty (30) days.

18
19 WHEREAS, a Petition for Appointment of Guardian *Ad Litem* for the Minor,
20 A.M., is on file and pending with the Court. (Docket No. 29.)

21
22 WHEREAS, the parties require additional reasonable time to finalize their Joint
23 Motion, as described above.

24
25 WHEREAS, to facilitate the efficient resolution of this action the parties have
26 met and conferred regarding a further brief extension of time for Morgan to file her response
27 to Interpleader Complaint in order to give the parties time to finalize the settlement process
28 that the parties have undertaken, and to permit the efficient resolution and dismissal with

1 prejudice of, this Interpleader action as to all parties, without incurring any unnecessary
2 expense and cost to the parties and to this Court.

3
4 WHEREAS, a brief Joint Status Report is being filed concurrently with the
5 Court.

6
7 IT IS HEREBY JOINTLY AGREED AND REQUESTED, by and between the
8 undersigned parties, that Andrea Morgan's last day to file her response to the Interpleader
9 Complaint with the Court shall be extended from January 17, 2014 to February 28, 2014.

10 Dated: January 16, 2014

MILLER LAW GROUP

11
12 By: /s/Jennifer A. Shy
13 JENNIFER A. SHY
14 Attorneys for Plaintiff
THE PRUDENTIAL INSURANCE
COMPANY

15 Dated: January 17, 2014

16 By: /s/ Andrea Morgan
17 Andrea Morgan
18 In Pro Per
(original signature retained by attorney
Jennifer A. Shy)

19 Dated: January 16, 2014

CANDICE FIELDS LAW

20 By: /s/ Candice L. Fields
21 CANDICE L. FIELDS
22 Attorney for Defendant INGERLISHA
23 MARTINEZ, As Mother And Next Friend
24 Of The Minor Child A.M.
25
26
27
28

ORDER

Based on the reasons set forth in the Joint Request of the parties filed on January 17, 2014, and good cause appearing therefrom, the Court grants the Request of the parties in its entirety. IT IS HEREBY ORDERED that the deadline for Defendant Andrea Morgan to file a Response to the Interpleader Complaint shall be extended to February 28, 2014.

IT IS SO ORDERED.

Dated: January 28, 2014



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