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SYNGEN, INC.
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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10 SACRAMENTO DIVISION

11 SCOTTSDALE INSURANCE COMPANY,
12 an Ohio corporation,

13 Plaintiff,

14 v.

15 SYNGEN, INC., a California corporation,
16 PHILIP COELHO, an individual, PRINCE
EMMANUEL, an individual, and
17 TERRENCE WOLF, an individual,

18 Defendants.

Case No. 2:15-cv-00142-JAM-DAD

**STIPULATION FOR THIRD EXTENSION
OF TIME TO RESPOND TO
COMPLAINT AND PROPOSED ORDER
IN LIGHT OF PARTIES' INTERIM
RESOLUTION (L.R. 144)**

Complaint filed: January 16, 2015
Complaint served: February 6, 2015
Current response date: May 26, 2015
New response date: June 2, 2015

19 Plaintiff SCOTTSDALE INSURANCE COMPANY ("Plaintiff") and Defendants
20 SYNGEN, INC., PHILIP COELHO, PRINCE EMMANUEL, and TERRENCE WOLF
21 ("Defendants"), by and through their respective counsel, hereby stipulate and agree as follows:

22 WHEREAS, on January 16, 2015, Plaintiff filed its Complaint in this action;

23 WHEREAS, on February 6, 2015, Plaintiff served Defendants with a copy of the
24 Complaint and Summons in a Civil Action;

25 WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a), Defendants initially
26 needed to file and serve a response to Plaintiff's Complaint on or before April 7, 2015;

27 WHEREAS, on April 3, 2015, the parties stipulated to an initial 21-day extension of time
28 for Defendants to respond to Plaintiff's Complaint to and including April 28, 2015 pursuant to

STIP FOR 3RD EXTENSION OF TIME TO
RESPOND TO COMPLAINT & PROPOSED
ORDER -- 2:15-CV-00142-JAM-DA

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1 Civil Local Rule 144;

2 WHEREAS, the parties stipulated to a further extension of time for Defendants to respond
3 to Plaintiff's Complaint to and including May 26, 2015 pursuant to Civil Local Rule 144;

4 WHEREAS, the parties have now agreed in principle to an interim resolution of all issues
5 raised in Plaintiff's Complaint that includes an agreement to stay this action pending final
6 resolution of the underlying litigation, and the parties are currently finalizing a written interim
7 resolution agreement, as well as a stipulation and proposed order staying this action;

8 WHEREAS, the parties wish to extend the deadline for Defendants to respond to the
9 Complaint by an additional 7 days to allow them to finalize the interim resolution agreement and
10 stipulation and proposed order for stay;

11 WHEREAS, this is the parties' third stipulation to extend the deadline for Defendants to
12 respond to the Complaint;

13 NOW, THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE THAT
14 Defendants shall have to and including June 2, 2015, to move, answer, or otherwise respond to
15 Plaintiff's Complaint.

16 IT IS SO STIPULATED.

17 Dated: May 26, 2015

FARELLA BRAUN + MARTEL LLP

18 I represent that concurrence in the
19 filing of this document has been
20 obtained from the other signatory,
which shall serve in lieu of his
signature on this document.

By: /s/ Tyler C. Gerking
Tyler C. Gerking

Attorneys for Defendant
SYNGEN, INC.

23 Dated: May 26, 2015

KAUFMAN DOLOWICH & VOLUCK, LLP

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By: /s/ Louis H. Castoria
Louis H. Castoria

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Attorneys for Plaintiff
SCOTTSDALE INSURANCE COMPANY

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 5/26/2015

/s/ John A. Mendez
Hon. John A. Mendez
United States District Court Judge