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11 Attorneys for Defendant
12 SYNGEN, INC.
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8 UNITED STATES DISTRICT COURT
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10 EASTERN DISTRICT OF CALIFORNIA
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12 SACRAMENTO DIVISION

13 SCOTTSDALE INSURANCE COMPANY,
14 an Ohio corporation,

15 Plaintiff,
16
17 v.

18 SYNGEN, INC., a California corporation,
19 PHILIP COELHO, an individual, PRINCE
20 EMMANUEL, an individual, and
21 TERRENCE WOLF, an individual,

22 Defendants.

23 Case No. 2:15-cv-00142-JAM-DA

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

26 Complaint filed: January 16, 2015
27 Complaint served: February 6, 2015
28 Current response date: June 2, 2015
New response date: June 9, 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 4TH EXTENSION OF TIME TO
RESPOND TO COMPLAINT & PROPOSED
ORDER -- 2:15-CV-00142-JAM-DA

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 stipulated to a further extension of time for Defendants to respond
5 to Plaintiff's Complaint to and including June 2, 2015 pursuant to Civil Local Rule 144 after
6 reaching an agreement in principle to an interim resolution of all issues raised in Plaintiff's
7 Complaint that includes an agreement to stay this action pending final resolution of the
8 underlying litigation;

9 WHEREAS, one final issue has been unexpectedly raised today (June 2, 2015) that the
10 parties need some limited additional time to resolve;

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

14 WHEREAS, this is the parties' fourth stipulation to extend the deadline for Defendants to
15 respond to the Complaint;

16 NOW, THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE THAT
17 Defendants shall have to and including June 9, 2015, to move, answer, or otherwise respond to
18 Plaintiff's Complaint.

19 IT IS SO STIPULATED.

20
21 Dated: June 2, 2015

FARELLA BRAUN + MARTEL LLP

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

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

25 Attorneys for Defendant
26 SYNGEN, INC.

1 Dated: June 2, 2015

KAUFMAN DOLOWICH & VOLUCK, LLP

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

5 Attorneys for Plaintiff
6 SCOTTSDALE INSURANCE COMPANY

7 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

10 Dated: 6/2/2015

/s/ John A. Mendez

11 Hon. John A. Mendez
12 United States District Court Judge

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