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

11 SCOTTSDALE INSURANCE COMPANY,  
an Ohio corporation,

12 Plaintiff,

13 v.  
14

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

17 Defendants.  
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Case No. 2:15-cv-00142-JAM-DA

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

Complaint filed: January 16, 2015  
Complaint served: February 6, 2015  
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

Attorneys for Defendant  
SYNGEN, INC.

1 Dated: June 2, 2015

KAUFMAN DOLOWICH & VOLUCK, LLP

2  
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.**

8  
9  
10 Dated: 6/2/2015

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