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TERRENCE WOLF

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SCOTTSDALE INSURANCE COMPANY,) Case No.: 2:15-CV-00142-JAM-DAD
an Ohio corporation,)

Plaintiff,)

v.)

**JOINT STIPULATION TO EXTEND TIME
TO RESPOND; ORDER**

SYNGEN, INC., a California corporation,)
PHILIP COELHO, an individual, PRINCE)
EMMANLUEL, an individual, and)
TERRENCE WOLF, an individual.)

Defendants.)

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2 All parties herein, Plaintiff SCOTTSDALE INSURANCE COMPANY (“Plaintiff”) and
3 Defendants SYNGEN, INC., PHILIP COELHO, PRINCE EMMANUEL, and TERRENCE WOLF
4 (“Defendants”), collectively referred to as the “Parties,” have reached a joint stipulation regarding
5 Plaintiff’s deadline to file and serve its opposition to Defendants’ Motion to Dismiss.

6 **RECITALS**

7 WHEREAS, Defendants filed a Motion to Dismiss, which is scheduled to be heard on
8 September 2, 2015 at 9:30 a.m. in Department 6;

9 WHEREAS, Plaintiff’s deadline to file and serve its opposition to Defendants’ Motion to
10 Dismiss is currently August 19, 2015;

11 WHEREAS, the Parties agree to extend Plaintiff’s deadline to file and serve its opposition to
12 Defendants’ Motion to Dismiss until Monday, October 5, 2015;

13 WHEREAS, no extensions have already been obtained by any party as to Defendants’ Motion
14 to Dismiss;

15 WHEREAS, the Parties jointly request that the Court set a new hearing date for Defendants’
16 Motion to Dismiss, currently scheduled for September 2, 2015 at 9:30 a.m. in Department 6, on or
17 after October 12, 2015, as is convenient to the Court.

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23 [Stipulation follows on next page]
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1 **STIPULATION**

2 IT IS HEREBY STIPULATED by and between the Parties hereto through their respective
3 attorneys of record as follows:

4 1. Plaintiff’s deadline to file and serve its opposition to Defendants’ Motion to Dismiss is
5 extended from August 19, 2015 until October 5, 2015.

6 2. The Parties jointly request that the Court set a new hearing date for Defendants’
7 Motion to Dismiss, currently scheduled for September 2, 2015 at 9:30 a.m. in Department 6, on or
8 after October 12, 2015, as is convenient to the Court.

9 IT IS SO STIPULATED.

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11 DATED: _____

KAUFMAN DOLOWICH & VOLUCK, LLP

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13 /s/ Louis H. Castoria
14 LOUIS H. CASTORIA, ESQ.
15 SHEILA M. PHAM, ESQ.
16 Attorneys for Plaintiff
SCOTTSDALE INSURANCE COMPANY

17 DATED: August 13, 2015

BAILEY CAVALIERI, LLC

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19 /s/ Sabrina Haurin
20 SABRINA HAURIN, ESQ.
21 KEITH LITTLE, ESQ.
22 Attorneys for Plaintiff
SCOTTSDALE INSURANCE COMPANY

23 DATED: August 13, 2015

FARELLA BRAUN + MARTEL, LLP

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25 /s/ Tyler C. Gerking
26 MARY E. MCCUTCHEON
27 TYLER C. GERKING
28 Attorneys for Defendants SYNGEN, INC., PHILIP
COELHO, PRINCE EMMANLUEL, and TERRENCE
WOLF

1 **ORDER**

2 Having considered the foregoing Joint Stipulation of all Parties, and good cause appearing, IT
3 IS HEREBY ORDERED:

4 1. Plaintiff's deadline to file and serve its opposition to Defendants' Motion to Dismiss is
5 extended from August 19, 2015 until October 7, 2015;

6 2. Defendant's reply brief shall be filed on or before October 14, 2015;

7 3. The Court resets the hearing on Defendants' Motion to Dismiss, currently scheduled for
8 September 2, 2015 at 9:30 a.m. in Courtroom 6, to October 21, 2015, at 9:30 a.m. in Courtroom #6.

9 IT IS SO ORDERED.
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11 DATED: 8/14/2015

12 /s/ John A. Mendez
13 Honorable John A. Mendez
14 U. S. District Court Judge
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