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13 **UNITED STATES DISTRICT COURT**

14 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

15 **(SACRAMENTO DIVISION)**

16 THE RANCHO TEHAMA ASSOCIATION, a  
17 California nonprofit mutual benefit corporation,

18 Plaintiff,

19 v.  
20 FEDERAL INSURANCE COMPANY, an  
21 Indiana corporation,

22 Defendant.

23 Case No. 2:15-CV-00291-JAM-CMK

24 **STIPULATION AND JOINT REQUEST TO  
25 FACILITATE SETTLEMENT BY  
26 EXTENDING TIME FOR FEDERAL  
27 INSURANCE COMPANY TO RESPOND TO  
28 COMPLAINT; ORDER**

29 Complaint Filed: February 4, 2015  
30 Trial Date: August 1, 2016

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## **STIPULATION AND JOINT APPLICATION**

Pursuant to Federal Rule of Civil Procedure 12(a)(4)(A), defendant Federal Insurance Company's response to the complaint in the above-captioned action is due on June 12, 2015, unless the Court sets a different deadline. The parties have reached a settlement of this action and, to facilitate documenting and finalizing the settlement, hereby apply jointly to the Court to approve a 30-day extension (to July 13, 2015) of Federal's deadline to file a responsive pleading. Subject to the terms of the settlement (which are confidential), this action will be dismissed with prejudice.

## IT IS SO STIPULATED.

Dated: June 8, 2015

SELTZER CAPLAN McMAHON VITEK  
A Law Corporation

By: /s/ Michael G. Nardi, Esq.  
Michael G. Nardi, Esq.

Atorneys for Defendant, FEDERAL INSURANCE COMPANY

Dated: June 8, 2015

# MORALES FIERRO & REEVES

By: /s/ Elizabeth Celniker  
(as authorized on June 8, 2015)  
Ramiro Morales, Esq.  
Elizabeth Celniker, Esq.  
Attorneys for Plaintiff, THE RANCHO TEHAMA  
ASSOCIATION

## ORDER

IT IS SO ORDERED.

Dated: 6/8/2015

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