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8	PHILADELPHIA INDEMNITY INSURANCE COMPANY		
9			
10	UNITED STATES DISTRICT COURT		
11	EASTERN DISTRICT OF CALIFORNIA		
12	CAMD DICHADDSON DESORT INC	Civil Action No.: 2:15-CV-01101-TLN-	
13	CAMP RICHARDSON RESORT, INC., Plaintiff,	AC	
14	V.	SECOND STIPULATION TO EXTEND	
15		TIME TO RESPOND TO COMPLAINT (L.R. 144) AND ORDER	
16	PHILADELPHIA INDEMNITY INSURANCE COMPANY;		
17	Defendant.	HONORABLE TROY L. NUNLEY	
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22			
23	TO THE CLERK OF THE ABOVE-ENTITLED COURT:		
24	On June 16, 2015, the parties filed a stipulation pursuant to Eastern District Local		
25	Rule 144 (Fed. Rules Civ. Proc., rule 6), stating that Defendant Philadelphia Indemnity		
26	Insurance Company may have up to and including July 7, 2015, to file an answer or		
27	otherwise respond to the complaint. That was the first extension of time in this case and		
28	extended the time to file by 20 days.		
	SECOND STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT		

1	The parties now seek the Court's approval to stipulate that Philadelphia may have up		
2	to and including July 17, 2015, to file an answer or otherwise respond to the complaint.		
3	This is the second extension of time in this case.		
4	Philadelphia seeks this extension because it intends to file a motion under Rule		
5	12b(6) and the complexity of the issues is such that defense counsel has not been able to		
6	complete its motion under the original two-week extension and will need another ten days		
7	to do so. The additional time is additionally justified because the two defense attorneys		
8	working on this matter have encountered several short-term legal emergencies on other		
9	engagements that have prevented them from devoting full time to the preparing of their		
10	initial motion here and their time has been further reduced due to a partner in their firm		
11	taking sabbatical, creating a crush of work. The Plaintiff does not object to Philadelphia's		
12	request for a second extension.		
13			
14	Dated: July 6, 2015 BANKS & WATSON		
15			
16	By: /s/ ROBERTA LINDSEY SCOTT		
17	Attorneys for Plaintiff CAMP RICHARDSON RESORT, INC.		
18			
19	Dated: July 6, 2015 NIELSEN, HALEY & ABBOTT LLP		
20			
21	By: /s/ CHRISTINE B. CUSICK		
22	Attorneys for Defendant PHILADELPHIA INDEMNITY INSURANCE COMPANY		
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24			
25	In accordance with the foregoing stipulation IT IS SO ORDERED.		
26			
27	Dated: July 8, 2015		
28	Troy L. Nunley United States District Judge		
	SECOND STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT		
	SECOND STIL CLATION TO EATEND TIME TO RESPOND TO COMPLAINT		