

1 DOWNEY BRAND LLP  
ANTHONY L. VIGNOLO (Bar No. 203933)  
2 MATTHEW J. WEBER (Bar No. 227314)  
AVALON J. FITZGERALD (Bar No. 288167)  
3 621 Capitol Mall, 18th Floor  
Sacramento, CA 95814-4731  
4 Telephone: 916.444.1000  
Facsimile: 916.444.2100  
5 avignolo@downeybrand.com  
mweber@downeybrand.com  
6 afitzgerald@downeybrand.com

7 Attorneys for Defendant  
WILLIS OF TEXAS, INC.

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

ALPHA DYNO NOBEL, a California  
corporation,

Plaintiff,

v.

WILLIS OF TEXAS, INC., a Texas  
corporation,

Defendant.

Case No. 2:15-cv-01745-WBS-CKD

**STIPULATION FOR 9 DAY EXTENSION  
OF TIME TO RESPOND TO COMPLAINT**

---

DOWNEY BRAND LLP

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD;

Pursuant to Local Rules 143 and 144 of the United States District Court for the Eastern District of California, Defendant Willis of Texas (“Defendant”), by and through its counsel, Avalon J. Fitzgerald of Downey Brand LLP, and Plaintiff ALPHA Dyno Nobel (“Plaintiff”), by and through its counsel, Kathleen C. Lyon, stipulate and agree as follows:

Because Plaintiff and Defendant are currently negotiating a tolling and cooperation agreement, Defendant is granted an extension of nine (9) days to respond to Plaintiff’s Complaint in this matter, from October 7, 2015, up to and including October 16, 2015.

SO STIPULATED.

DATED: October 6, 2015

DOWNEY BRAND LLP

By: /s/ Avalon J. Fitzgerald  
AVALON J. FITZGERALD  
Attorney for Defendant  
WILLIS OF TEXAS, INC.


DATED: October 6, 2015

ARONOWITZ SKIDMORE LYON, APLC

By: /s/ Kathleen C. Lyon (as authorized on 10/6/15)  
KATHLEEN C. LYON  
Attorney for Plaintiff  
ALPHA DYNO NOBEL

**IT IS SO ORDERED.**

Dated: October 6, 2015

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE