

1 Linda B. Oliver (SBN 166720)
 loliver@maynardcooper.com
 2 MAYNARD COOPER & GALE, LLP
 600 Montgomery Street, Suite 2600
 San Francisco, California 94111
 3 Telephone: (415) 704-7433
 Facsimile: (205) 254-1999

4 Attorney for Defendant
 5 UNITED STATES LIFE
 INSURANCE COMPANY

6 T.D. Bolling, Jr. (SBN 33236)
 7 BOLLING & GAWTHROP
 A Professional Corporation
 8 8880 Cal Center Drive, Suite 190
 Sacramento, California 95826
 Telephone: (916) 369-0777
 9 Facsimile: (916) 369-2698

10 Attorney for Plaintiff
 MARGO STENSION

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 12 **UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF CALIFORNIA**

13	MARGO STENSION,)	Case No.: 2:16-CV-00782-JAM-CKD
)	
14	Plaintiff,)	STIPULATION AND ORDER
)	GRANTING LEAVE TO FILE
15	vs.)	AMENDED COMPLAINT AND
)	EXTENDING DEADLINE FOR
16	UNITED STATES LIFE INSURANCE)	DEFENDANT TO RESPOND
	COMPANY,)	
)	
17	Defendant.)	
)	
18)	
)	

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1 Plaintiff Margo Stension (“Plaintiff”) and Defendant United States Life Insurance
2 Company (“Defendant” or “US Life”), hereby jointly stipulate by and through their respective
3 attorneys of record as follows:

4 1. This action involves a dispute between the parties concerning an accidental death
5 and dismemberment policy under which plaintiff’s decedent was insured at the time of his death;

6 2. The present deadline for Defendant US Life to respond to Plaintiff’s complaint on
7 file herein is September 2, 2016;

8 3. After the original complaint in this action was filed, the Sacramento County
9 Coroner issued an amended death certificate for Plaintiff’s decedent, a copy of which has been
10 provided by counsel for Plaintiff to counsel for Defendant;

11 4. Counsel for Plaintiff has advised Counsel for Defendant of his intention to file an
12 amended complaint in this action that will reflect the amended death certificate issued by the
13 Sacramento County Coroner and will add a cause of action for breach of the implied covenant of
14 good faith and fair dealing;

15 5. Counsel for Plaintiff has provided a draft copy of the amended complaint to
16 counsel for Defendant, who has agreed to stipulate to an order granting leave to file an amended
17 complaint;

18 6. Counsel for both parties agree that Defendant’s deadline to file a response to the
19 complaint may be extended by 30 days, until October 3, 2016, and no response to the original
20 pleading need be filed if this Court issues an order allowing the filing of the amended complaint.

21 For the foregoing reasons, the parties jointly request that the Court issue an order (1)
granting Plaintiff leave to file an Amended Complaint, and (2) extending the time of Defendant
US Life to respond to and including October 3, 2016.

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1 Date: September 2, 2016

MAYNARD, COOPER & GALE, LLP

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By: /s/ Linda B. Oliver

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Linda B. Oliver

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Attorneys for Defendant
UNITED STATES LIFE INSURANCE COMPANY

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Date: September 2, 2016

BOLLING & GAWTHROP

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By: /s/ T.D. Bolling, Jr

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T.D. Bolling, JR.

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Attorneys for Plaintiff
MARGO STENSION

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ORDER

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Pursuant to the stipulation of the parties, and for good cause appearing, IT IS HEREBY

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ORDERED THAT (1) Plaintiff has leave to file an Amended Complaint and (2) Defendant's

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shall file a responsive pleading on or before October 3, 2016.

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IT IS SO ORDERED.

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Dated: 9/2/2016

/s/ John A. Mendez
JOHN A MENDEZ
UNITED STATES DISTRICT JUDGE

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