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13 **UNITED STATES DISTRICT COURT**
 14 **EASTERN DISTRICT OF CALIFORNIA**

15 THE TRAVELERS INDEMNITY
 16 COMPANY OF CONNECTICUT, a
 17 Connecticut corporation,
 18
 19 Plaintiff,
 20
 21 vs.
 22
 23 LEXINGTON INSURANCE COMPANY, a
 24 Delaware corporation; DOES 1-10, inclusive,
 25
 26 Defendants.

27 CASE NO.: 2:16-CV-02620-JAM-DB
 28
**STIPULATION AND
 ORDER TO CONTINUE DISMISSAL
 DATE**
 Complaint filed: November 2, 2016

29 Plaintiff THE TRAVELERS INDEMNITY COMPANY OF CONNECTICUT
 30 (“Travelers”) and Defendant LEXINGTON INSURANCE COMPANY (“Lexington”) hereby
 31 submit the following Stipulation, pursuant to Local Rule 160 of the United States District Court,
 32 Eastern District of California, to continue the July 27, 2018 deadline to file settlement/dismissal
 33 documents, by approximately thirty (30) days to August 27, 2018, for good cause shown as follows:

34 WHEREAS, counsel for Travelers filed a Notice of Settlement of the Entire Action on April
 35 24, 2018, advising the Court that the parties had settled the case, were preparing settlement and
 36 dismissal documentation, and requested the Court set an order to show cause regarding dismissal no
 37 later than 90 days from the date of the filing;

38 WHEREAS, on April 24, 2018, the Court issued a minute order, setting July 27, 2018 as the

1 deadline for counsel to file settlement/dismissal documents;

2 WHEREAS, the parties have worked diligently to prepare the settlement agreement and
3 expect that this will be accomplished in the next 30 days. A brief thirty (30) day continuance of the
4 July 27, 2018 deadline to file settlement/dismissal documents will not prejudice the parties, and
5 there are no additional hearing dates or deadlines before the Court in this action;

6 NOW THEREFORE, the parties, by and through their respective counsel of record, stipulate
7 and agree as follows:

8 **STIPULATION**

9 The parties stipulate to and request a Court order continuing the dismissal deadline by
10 approximately thirty (30) days, from July 27, 2018 to August 27, 2018.

11
12 DATED: July 25, 2018

THE AGUILERA LAW GROUP, APLC

13
14 /s/Ha Eun Cho, Esq. (as authorized on July 25, 2018).

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Attorneys for Plaintiff, THE TRAVELERS
INDEMNITY COMPANY OF CONNECTICUT

19 DATED: July 25, 2018

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20 /s/Drew P. Rosell, Esq.

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Attorneys for Defendant, LEXINGTON
INSURANCE COMPANY

25 **GOOD CAUSE HAVING BEEN SHOWN, IT IS SO ORDERED.**

27 DATED: 7/25/2018

/s/ John A. Mendez

UNITED STATES DISTRICT COURT JUDGE