

1 ANDREW D. HEROLD, ESQ., SBN 178640
 2 aherold@heroldsagerlaw.com
 3 JOSHUA A. ZLOTLOW, ESQ., SBN 211399
 4 jzlotlow@heroldsagerlaw.com
 5 HEROLD & SAGER
 6 550 Second Street, Suite 200
 7 Encinitas, CA 92024
 8 Telephone: (760) 487-1047
 9 Facsimile: (760) 487-1067
 10 Attorneys for Lexington Insurance Company

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

13 THE TRAVELERS INDEMNITY
 14 COMPANY OF CONNECTICUT, a
 15 Connecticut organization,
 16
 17 Plaintiffs,
 18
 19 vs.
 20 LEXINGTON INSURANCE COMPANY, a
 21 Delaware corporation; DOES 1-10, inclusive,
 22
 23 Defendants.

CASE NO.: 2:16-CV-02620-JAM-DB

**STIPULATION TO EXTEND TIME TO
 FILE A RESPONSIVE PLEADING TO
 INITIAL COMPLAINT (FIRST
 REQUEST)**

 Complaint served: November 16, 2016
 New response date: December 22, 2016

24 Plaintiff THE TRAVELERS INDEMNITY COMPANY OF CONNECTICUT (“Travelers”)
 25 and Defendant LEXINGTON INSURANCE COMPANY (“Lexington”), hereby submit the
 26 following Stipulation to Extend Time to File a Responsive Pleading to Initial Complain in the
 27 above-captioned action.

28 WHEREAS, Plaintiff file a complaint on November 2, 2016 (“Complaint”), in the United
 States District Court, Eastern District of California as case number 2:16-CV-02620-JAM-DB
 naming LEXINGTON INSURANCE COMPANY as a defendant;

WHEREAS, on or about November 16, 2016, Plaintiff served Lexington with the complaint
 through its registered agent for service of process;

///

1 WHEREAS, the parties have agreed to extend the time for Defendant to file a responsive
2 pleading to the Complaint until December 22, 2016;

3 NOW, THEREFORE, Plaintiff and Defendant, by and through their respective counsel of
4 record, hereby stipulate to allow for an extension of time for Defendant to file a responsive pleading
5 until December 22, 2016.

6
7 DATED: December 14, 2016

THE AGUILERA LAW GROUP, APLC

8

9

By: /s/ Kair M. Myron
A. ERIC AGUILERA, ESQ.
eaguilera@aguileragroup.com
KARI M. MYRON, ESQ.
kmyron@aguileragroup.com
Attorneys for Plaintiff, THE TRAVELERS
INDEMNITY COMPANY OF CONNECTICUT

10

11

12

13

14 DATED: December 14, 2016

HEROLD & SAGER

15

16

By: /s/ Joshua A. Zlotlow
ANDREW D. HEROLD, ESQ.
aherold@heroldsagerlaw.com
JOSHUA A. ZLOTLOW, ESQ.
jzlotlow@heroldsagerlaw.com
Attorneys for Defendant, LEXINGOTN
INSURANCE COMPANY

17

18

19

20

21

22 **IT IS SO ORDERED.**

23

24 **DATED: 12/14/2016**

/s/ John A. Mendez
UNITED STATES DISTRICT COURT JUDGE

25

26

27

28