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

13 THE TRAVELERS INDEMNITY
 14 COMPANY OF CONNECTICUT, a
 15 Connecticut organization,
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 17 Plaintiffs,
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 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 (SECOND
 REQUEST)**

Complaint served: November 16, 2016
 New response date: January 10, 2016

19 Plaintiff THE TRAVELERS INDEMNITY COMPANY OF CONNECTICUT (“Plaintiff”)
 20 and Defendant LEXINGTON INSURANCE COMPANY (“Defendant”) (together, Plaintiff and
 21 Defendant may be referred to as the “Parties”) hereby submit the following Stipulation to Extend
 22 Time to File a Responsive Pleading to the Complaint in the above-captioned action.

23 WHEREAS, Travelers filed a complaint on November 2, 2016 (“Complaint”), in the United
 24 States District Court, Eastern District of California as case number 2:16-CV-02620-JAM-DB
 25 naming Lexington as the Defendant;

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

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1 WHEREAS, the Parties have agreed to extend the time for Defendant to file a responsive
2 pleading to the Complaint until January 10, 2017;

3 WHEREAS, while the Court has granted one extension to file a responsive pleading until
4 December 22, 2016, certain facts have recently developed which may impact the Parties' positions
5 on the claims at issue in the Complaint and which may lead to early resolution of certain claims in
6 the Complaint;

7 NOW, THEREFORE, Plaintiff and Defendant, by and through their respective counsel of
8 record, hereby stipulate to allow for an extension of time for Defendant to file a responsive pleading
9 until January 10, 2017.

10 DATED: December 22, 2016

THE AGUILERA LAW GROUP, APLC

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By: /s/ Kari M. Myron
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18 DATED: December 22, 2016

HEROLD & SAGER

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By: /s/ Emily G. Cottrell
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25 **IT IS SO ORDERED.**

26 DATED: December 22, 2016

/s/ JOHN A. MENDEZ
UNITED STATES DISTRICT JUDGE

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