

Peter Dunn Lemmon, Esq., Ca. Bar No. 138691  
 Law Offices of Peter Dunn Lemmon  
 210 Magnolia Avenue, Suite 2  
 Auburn, California 95603  
 Email: peter@pdllaw.com  
 Telephone: 530.265.6100  
 FAX: 530-264-8448  
 Attorneys for Defendants Intercare Specialty Risk Insurance Services, Inc, and  
 ISR Holdings, Inc.

UNITED STATES DISTRICT COURT COURT  
 EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

KAREN RIGSBY, Trustee of the MARSH  
 REVOCABLE TRUST OF 2003, and  
 DONALD P. STEINMEYER, an individual,

Plaintiffs,

vs.

INTERCARE SPECIALITY RISK  
 INSURANCE SERVICES, INC., a California  
 Corporation; ISR HOLDINGS, INC., a  
 California Corporation; KEVIN HAMM, an  
 individual; and PATRIOT NATIONAL, INC.,  
 a Florida Corporation.

Defendants.

Case No.: 2:17-cv-01347-MCE-EFB

AMENDED EX PARTE APPLICATION  
 AND ORDER EXTENDING TIME TO: (1)  
 FILE A RESPONSIVE PLEADING TO THE  
 COMPLAINT; and, (2) FILE AN  
 OPPOSITION TO PLAINTIFFS'  
 APPLICATION FOR A RIGHT TO ATTACH  
 ORDER AND CONTINUE THE HEARING  
 DATE OF SEPTEMBER 7, 2017 TO ALLOW  
 FOR PREPARATION

Defendants INTERCARE SPECIALITY RISK INSURANCE SERVICES, INC., ISR  
 HOLDINGS, INC. and KEVIN HAMM hereby apply to the Court ex parte for an Order  
 extending their time to file:

- (1) Responsive pleadings to the Complaint in this Action; and
- (2) Opposition to Plaintiffs' Application for Right to Attach Order or continuing the  
 hearing date of September 7, 2017 on same to allow Defendants time to respond  
 to the Application.

1 The undersigned counsel advised counsel for Plaintiffs, Robert R. Riggs, of the need  
2 for such an extension, on Thursday August 17, 2017, but Plaintiffs' counsel denied the  
3 request. (See true and correct copy of email of 8.17.17 from Mr. Riggs attached hereto as  
4 Exhibit "A").  
5

6 Defendants' counsel has only been formally retained as of 1:30 p.m. Friday, August  
7 18, 2017, and upon retention and basic review of this case, it is clear the Plaintiffs filed this  
8 case on June 30, 2017, so there is no real urgency to have the Right to Attach Order heard.  
9

10 Also, such an extension is necessary to allow adequate time to prepare responsive  
11 pleadings to the Complaint and an Opposition and to prepare for the Right to Attach hearing.  
12 The press of business in this office does not allow enough time to file responsive pleadings  
13 on Wednesday and an Opposition on Thursday of the coming week.  
14

15 And finally, Defendants have not sought or obtained any previous extension of time.

16 Defendants respectfully request the Court grant thirty (30) days additional time by  
17 which to file pleadings responsive to the Complaint and an Opposition to Plaintiffs'  
18 Application or grant some other reasonable extension period allowing for proper preparation  
19 by these Defendants.  
20

21 DATED: August 21, 2017

\_\_\_\_\_/s/\_\_\_\_\_  
Peter Dunn Lemmon  
Attorney for INTERCARE SPECIALITY RISK  
INSURANCE SERVICES, INC., ISR HOLDINGS, INC.,  
and KEVIN HAMM  
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ORDER

Having considered Defendants' ex parte application for an extension of time to file responsive pleadings to the Complaint and an Opposition to Plaintiffs' Application for Right to Attach Order, and/or a continuance of the hearing on that Application currently set in this Court for September 7, 2017 in order to allow an extension of time to file their Opposition, and finding good cause therefore,

Defendants have to and including September 21, 2017, by which to file such responsive pleadings and their Opposition. Plaintiffs' Reply, if any, is due on September 28, 2017. The hearing on Plaintiff's Application for Right to Attach is continued to October 5, 2017 at 2:00 p.m.

IT IS SO ORDERED.

Dated: August 21, 2017

  
MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE