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 15 formerly known as HOWARD MCDONOUGH

16 **UNITED STATES DISTRICT COURT**  
 17 **NORTHERN DISTRICT OF CALIFORNIA**  
 18 **SAN FRANCISCO DIVISION**

19	JOSEPH HOWARD CARSELLO, formerly	)	CASE NO. 3:13-cv-03749 JSC
20	known as HOWARD MCDONOUGH,	)	
21	Plaintiff,	)	<b>STIPULATION TO EXTEND TIME</b>
22		)	<b>FOR DEFENDANTS TO RESPOND TO</b>
23	v.	)	<b>PLAINTIFF’S COMPLAINT;</b>
24		)	<b>[<del>PROPOSED</del>] ORDER</b>
25	LIFE INSURANCE COMPANY OF	)	<b>Judge:</b> Hon. Jacqueline Scott Corley
	NORTH AMERICA and MACY’S INC.	)	
	LONG TERM DISABILITY PLAN,	)	

27 **STIPULATION TO EXTEND TIME FOR DEFENDANTS TO RESPOND TO PLAINTIFF’S**  
**COMPLAINT; [~~PROPOSED~~] ORDER**  
 28 Case No. 3:13-cv-03749 JSC

1 Defendants. )  
2 )

3 IT IS HEREBY STIPULATED by and between the parties hereto through their  
4 respective attorneys that Defendants LIFE INSURANCE COMPANY OF NORTH AMERICA  
5 and MACY'S INC. LONG TERM DISABILITY PLAN may have additional time within which  
6 to answer or otherwise respond to plaintiff's complaint. Therefore, the last day for defendant to  
7 answer or otherwise respond to plaintiff's complaint is Thursday, September 26, 2013.

8 Good cause exists for this extension as defense counsel has just been assigned to this case  
9 and requires time to become knowledgeable about the case to prepare an initial pleading.

10 Additionally, defense counsel will be out of town from August 28, 2012 through September 7,  
11 2013 and September 14, 2013 through September 21, 2013 on business.

12 This document is being electronically filed through the Court's ECF System. In this  
13 regard, counsel for Defendants hereby attests that (1) the content of this document is acceptable  
14 to all persons required to sign the document; (2) Plaintiff's counsel has concurred with the filing  
15 of this document; and (3) a record supporting this concurrence is available for inspection or  
16 production if so ordered.

17  
18  
19 **RIMAC MARTIN, P.C.**

20 DATED: August 28, 2013

By: /s/ Anna M. Martin

ANNA M. MARTIN

Attorneys for Defendants

LIFE INSURANCE COMPANY OF NORTH  
AMERICA and MACY'S INC. LONG TERM  
DISABILITY PLAN

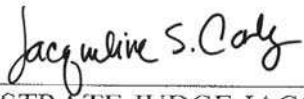
LEWIS FEINBERG LEE RENAKER &  
JACKSON P.C.

DATED: August 28, 2013

By: /s/ Joshua Davidson  
JOSHUA DAVIDSON  
Attorneys for Plaintiff  
JOSEPH HOWARD CARSELLO,  
formerly known as HOWARD MCDONOUGH

Pursuant to stipulation, **IT IS SO ORDERED.**

Dated: August 29, 2013

  
\_\_\_\_\_  
MAGISTRATE JUDGE JACQUELINE SCOTT  
CORELY