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6 *Attorneys for Defendants*  
Paul M. Zagaris, Inc., Jon Paul Zagaris,  
7 Karrie Goold, Danielle Hardcastle,  
Esther Gutierrez, Fred Oshtory,  
8 and Michael P. Dutra

9  
10 UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

13 HANOVER INSURANCE COMPANY,  
  
14 Plaintiff,  
  
15 v.  
  
16 PAUL M. ZAGARIS, INC., a California  
17 corporation, JON PAUL ZAGARIS, KARRIE  
18 GOOLD, DANIELLE HARDCASTLE,  
ESTHER GUTIERREZ, FRED OSHTORY,  
19 and MICHAEL P. DUTRA,  
  
20 Defendants.

CASE NO.: 3:16-CV-01099-JCS  
  
**STIPULATION TO EXTEND TIME FOR  
DEFENDANTS TO ANSWER OR  
OTHERWISE RESPOND TO  
PLAINTIFF'S COMPLAINT**  
  
**Assigned to: Hon. Joseph C. Spero**  
  
Action Filed: March 13, 2016

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22 Pursuant to the United States District Court, Northern District of California Local Rules,  
23 Rule 6-1(a), counsel for Plaintiff Hanover Insurance Company ("Hanover") and counsel for  
24 Defendants Paul M. Zagaris, Inc., Jon Paul Zagaris, Karrie Goold, Danielle Hardcastle, Esther  
25 Gutierrez, Fred Oshtory, and Michael P. Dutra (collectively "Defendants"), state:

26 The Summons and Complaint in this action have been served on the Defendants and a  
27 pleading responsive to the Complaint is currently due from Defendants on April 18, 2016.

28 Pursuant to Local Rule 6-1(a), the respective attorneys for Plaintiff Hanover Insurance

1 Company and Defendants agree to extend the time for Defendants to respond or otherwise plead to  
2 the Complaint to and including Monday, May 9, 2016, unless a subsequent order of the Court  
3 extends or has the effect of further extending the time for Defendants to respond or otherwise  
4 plead to the Complaint.

5 Current Court ordered event dates or deadlines are not affected by this stipulation.

6  
7 **IT IS SO STIPULATED.**

9 DATED: April 15, 2016

MEREDITH, WEINSTEIN & NUMBERS, LLP

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12 By: /s/ Shanti Eagle  
Shanti Eagle

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*Attorneys for Defendants*  
Paul M. Zagaris, Inc., Jon Paul Zagaris,  
14 Karrie Goold, Danielle Hardcastle,  
15 Esther Gutierrez, Fred Oshtory,  
and Michael P. Dutra

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DATED: April 15, 2016

LEWIS BRISBOIS BISGAARD & SMITH LLP

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Dated: 4/21/16



20 By: /s/ Perry M. Shorris  
Perry M. Shorris

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*Attorneys for Plaintiff*  
Hanover Insurance Company

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I, Shanti Eagle, hereby attest, based upon my own personal knowledge, that concurrence in the  
24 filing of this Stipulation has been obtained from each of the other Signatories hereto, which shall  
serve in lieu of their signatures on the document pursuant to Local Rule 5-1(i)(3).

25

I declare under penalty of perjury under the laws of the United States and State of  
26 California that the foregoing attestation is true and correct, and was executed on April 15, 2016 at  
Larkspur, California.

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/s/ Shanti Eagle  
Shanti Eagle

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**PROOF OF SERVICE**

*Hanover Insurance Company, v. Paul M. Zagaris, Inc. et al.*  
Case No. 3:16-CV-01099-JCS

I am a citizen of the United States, over the age of 18 years and not a party to the within action. I am employed in the City of Larkspur, County of Marin, California, and my business address is 115 Ward Street, Larkspur, California, 94939.

On April 18, 2016, I served the following document(s):

**Notice and Acknowledgement of Receipt of Summons and Complaint re:**

- **Paul M. Zagaris, Inc.,**
- **Jon Paul Zagaris,**
- **Karrie Goold,**
- **Danielle Hardcastle,**
- **Esther Gutierrez,**
- **Fred Oshtory, and**
- **Michael P. Dutra,**

I served the documents to the following parties:

Kathleen E. Hegen (104522)  
Perry Shorris (Pro Hac Vice)  
LEWIS BRISBOIS BISGAARD & SMITH, LLP  
333 Bush Street, Suite 1100  
San Francisco, CA 94104  
  
*Attorneys for Plaintiff*  
Hanover Insurance Company

       **By USPS:** I enclosed the document(s) in a sealed envelope or package addressed to the person at the address listed above and deposited the sealed envelope with the United States Postal Service, with the postage fully prepaid.

  **X**   **By Electronic Service:** through the Court’s Notice of Electronic Filing CM/ECF.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on April 18, 2016, at Larkspur, California.

  
\_\_\_\_\_  
Charles D. Yeo