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Attorneys for Defendants  
 10 RIVERSOURCE LIFE INSURANCE COMPANY,  
 AMERIPRISE FINANCIAL SERVICES, INC.,  
 11 AMERIPRISE HOLDINGS, INC.  
 and AMERIPRISE FINANCIAL, INC.

12  
 13 **UNITED STATES DISTRICT COURT**  
 14 **NORTHERN DISTRICT OF CALIFORNIA**

15 PAUL M. DAVIS, individually and as  
 trustee/settlor/grantor of the PAUL M. DAVIS  
 16 REVOCABLE TRUST OF 2011, and the PAUL  
 M. DAVIS REVOCABLE TRUST OF 2011,

Plaintiffs,

17 vs.

18 RIVERSOURCE LIFE INSURANCE  
 COMPANY, a Minnesota corporation,  
 19 AMERIPRISE FINANCIAL SERVICES, INC.,  
 a Delaware corporation, AMERIPRISE  
 20 HOLDINGS, INC., a Delaware corporation, and  
 AMERIPRISE FINANCIAL, INC., a Delaware  
 21 corporation,

Defendants.

) Case No.: 3:16-cv-02801 JCS

) **JOINT STIPULATION TO**  
 ) **CONTINUE DEADLINE FOR**  
 ) **DEFENDANTS TO RESPOND TO**  
 ) **PLAINTIFFS' COMPLAINT**

) Complaint Filed: May 24, 2016

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 JOINT STIPULATION TO CONTINUE DEADLINE FOR  
 DEFENDANTS TO RESPOND TO PLAINTIFF'S COMPLAINT

1 **JOINT STIPULATION**

2 Pursuant to Civil Local Rule 6-1, Plaintiff Paul M. Davis, individually and as  
3 trustee/settlor/grantor of the Paul M. Davis Revocable Trust of 2011 and Plaintiff the Paul M.  
4 Davis Revocable Trust of 2011 (“Plaintiffs”) and Defendants RiverSource Life Insurance  
5 Company (“RiverSource”), Ameriprise Financial Services, Inc., Ameriprise Holdings, Inc. and  
6 Ameriprise Financial, Inc. (collectively, the “Parties”), make a special and limited appearance to  
7 hereby jointly stipulate to an extension of time for Defendants to respond to Plaintiffs’  
8 Complaint. The Parties agree and stipulate that Defendants will respond to Plaintiff’s Complaint  
9 on or before July 21, 2016. In support of this Stipulation, the Parties agree and stipulate as  
10 follows:

11 1. On May 24, 2016, Plaintiffs initiated the present action against Defendants in the  
12 United States District Court for the Northern District of California. (*See* ECF Doc. No. 1).

13 2. Defendants were served with the Summons and Complaint in this action on May  
14 31, 2016. Defendants’ responsive pleading is therefore due on or before June 21, 2016.

15 3. The Parties have agreed to a thirty (30) day extension of time for Defendants to  
16 respond to Plaintiffs’ Complaint from the original date.

17 4. This Stipulation is necessary because Defendants’ counsel need additional time to  
18 review and research the issues raised by Plaintiffs’ Complaint and to frame appropriate  
19 responsive pleadings or motions. Nothing herein shall be construed as a waiver of any defense  
20 by any Defendant including, but not limited to, those defenses specifically identified in Rules 8  
21 and 12 of the Federal Rules of Civil Procedure.

22 5. This Stipulation will not alter the date of any event or deadline already fixed by  
23 Court order.

1 We hereby attest that concurrence in the filing of this stipulation was obtained by each of  
2 the below identified signatories.

3 Date: June 21, 2016

MAYNARD, COOPER & GALE, LLP

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By: /s/ Linda B. Oliver  
Linda B. Oliver

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Attorneys for Defendants  
RIVERSOURCE LIFE INSURANCE COMPANY,  
AMERIPRISE FINANCIAL SERVICES, INC.,  
AMERIPRISE HOLDINGS, INC.  
and AMERIPRISE FINANCIAL, INC.

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9 Date: June 21, 2016

EVANS LAW FIRM, INC.

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By: /s/ Michael A. Levy  
Michael A. Levy

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Attorneys for Plaintiffs PAUL M. DAVIS and the  
PAUL M. DAVIS REVOCABLE TRUST OF 2011

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15 Dated: June 23, 2016



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**PROOF OF SERVICE**

STATE OF CALIFORNIA )  
COUNTY OF SAN FRANCISCO )

I am employed in the County of San Francisco, State of California. I am over the age of 18 and not a party to the within action. My business address is 600 Montgomery Street, Suite 2600, San Francisco, California 94111.

On the date indicated below, I served the foregoing document described as:

**JOINT STIPULATION TO CONTINUE DEADLINE FOR  
DEFENDANTS TO RESPOND TO PLAINTIFF'S COMPLAINT**

[X] BY CM/ECF ELECTRONIC SERVICE: On the following registered CM/ECF users with the Court, and have consented to service through the Court's automatic transmission of notice of electronic filing

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I declare that I am employed in the office of an attorney who has been admitted to this Court, at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed June 21, 2016, at San Francisco, California.

  
\_\_\_\_\_  
Mila Dunn