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6 Attorneys for Defendant
 7 THE LINCOLN NATIONAL LIFE INSURANCE
 8 COMPANY

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA

11
 12 DARRELL WILEY,
 13 Plaintiff,
 14 v.
 15 THE LINCOLN NATIONAL LIFE
 16 INSURANCE COMPANY,
 17 Defendant.

Case No. 3:16-cv-02811-JCS
**STIPULATION TO EXTEND TIME TO
 RESPOND TO COMPLAINT**

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1 Pursuant to Local Rule 6-1, Plaintiff Darrell Wiley and Defendant The Lincoln National
2 Life Insurance Company (“Lincoln”) (together, the “Parties”), through their respective attorneys
3 of record, hereby stipulate as follows:

4 WHEREAS, Plaintiff filed an initial complaint in this case on May 25, 2016 and served
5 Lincoln with the complaint by certified mail on June 2, 2016;

6 WHEREAS, Lincoln requested and Plaintiff has agreed to extend Lincoln's current
7 deadline to respond to the Complaint from June 23, 2016 to July 8, 2016;

8 WHEREAS, the Parties’ proposed change in the deadline for Lincoln’s responsive
9 pleading extends this deadline by not more than 30 days and will not alter the date of any event or
10 deadline already fixed by Court order, and therefore the Parties may enter into this stipulation
11 pursuant to Local Rule 6-1(a) without Court order;

12 IT IS HEREBY STIPULATED AND AGREED that Lincoln shall file its responsive
13 pleading in this matter no later than July 8, 2016.

14 IT IS SO STIPULATED.

15 Dated: June 22, 2016

LAW OFFICES OF LAURENCE F.
PADWAY

18 By: /s/ Laurence F. Padway
19 LAWRENCE F. PADWAY

20 Attorneys for Plaintiff
21 DARRELL WILEY

22 Dated: June 22, 2016

DENTONS US LLP

24 Dated: 6/24/16



25 By /s/ Douglas Scullion
26 Douglas A. Scullion
27 Anna Shiran Youssefi

28 Attorneys for Defendant
THE LINCOLN NATIONAL LIFE
INSURANCE COMPANY

1 **ATTESTATION OF E-FILED SIGNATURE**

2 I, Douglas Scullion, am the ECF User whose identification and password are being used
3 to file the foregoing STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL
4 COMPLAINT BY NOT MORE THAN 30 DAYS (L.R.6-1(a). In compliance with Local Rule
5 5-1 (i), I hereby attest that Laurence F. Padway has concurred in this filing.

6
7 Dated: June 22, 2016

By /s/ Douglas Scullion

Douglas A. Scullion

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