

1 Charles W. Bennion (Nevada Bar No. 5582)
 2 ELLSWORTH & BENNION, CHTD.
 3 777 N. Rainbow Blvd., Suite 270
 4 Las Vegas, Nevada 89107
 5 Telephone: (702) 658-6100
 6 Facsimile: (702) 658-2502
 7 Email: charles@silverstatelaw.com

8 Patrick F. Welch (Nevada Bar No. 13278)
 9 JENNINGS, STROUSS & SALMON, P.L.C.
 10 A Professional Limited Liability Company
 11 One East Washington Street, Suite 1900
 12 Phoenix, Arizona 85004-2554
 13 Telephone: (602) 262-5911
 14 Facsimile: (602) 495-2784
 15 Email: pwelch@jsslaw.com

16 Attorneys for Plaintiff
 17 Old Republic Insurance Company

18 **IN THE UNITED STATES DISTRICT COURT**
 19 **FOR THE DISTRICT OF NEVADA**

20 OLD REPUBLIC INSURANCE
 21 COMPANY, a Pennsylvania corporation,

22 Plaintiff

23 vs.

24 CITY PLAN DEVELOPMENT, INC. dba
 25 SAVI CONSTRUCTION, a Nevada
 26 corporation; and ERNESTO J. SAVINO
 27 and CYNTHIA WILSON aka CYNTHIA
 28 SAVINO, Nevada individuals and
 individually and as husband and wife,

Defendants

No. 2:16-cv-00903

**STIPULATED MOTION TO
 CONTINUE BRIEFING SCHEDULE
 IN RESPONSE TO OCTOBER 26,
 2016 ORDER TO SHOW CAUSE**

(First Request)

29 Pursuant to LR 6-1, Old Republic Insurance Company (“Old Republic”) and
 30 Defendants City Plan Development, Inc. dba Savi Construction, Ernesto J. Savino and
 31 Cynthia Wilson aka Cynthia Savino (collectively “Defendants”), through their respective
 32 undersigned counsel, hereby stipulate and agree to extend the deadline for Old Republic to
 33 respond to the Court’s Order to Show Cause [ECF No. 60; filed on October 26, 2016] until
 34 November 16, 2016. Consistent with the Court’s Order to Show Cause, Defendants shall

1 have seven days thereafter to file their response. No reply shall be filed.

2 The parties are discussing a possible resolution of Old Republic's claims against
3 Defendants that would result in a dismissal of this action, and the proposed extension of
4 time will provide the parties with additional time to complete their settlement discussions
5 before incurring additional attorneys' fees and using the Court's time and resources. A
6 proposed form of Order is submitted herewith.

7 Dated this 4th day of November, 2016.

8 **JENNINGS, STROUSS & SALMON, PLC**

9
10 By: /s/ Patrick F. Welch
11 Patrick F. Welch (Nevada Bar No. 13278)
12 One East Washington, Suite 1900
13 Phoenix, Arizona 85004-2554
14 *Attorneys for Plaintiff Old Republic Insurance*
15 *Company*

16 **SHUMWAY VAN**

17 By: /s/ Brent D. Huntley (with permission)
18 Michael C. Van, Esq. (Nevada Bar No. 3876)
19 Brent D. Huntley, Esq. (Nevada Bar No. 12405)
20 8985 S. Eastern Avenue, Suite 100
21 Las Vegas, Nevada 89123
22 *Attorneys for Defendants*

23 **CERTIFICATE OF SERVICE**

24 I hereby certify that on November 4, 2016, I electronically transmitted the attached
25 document to the Clerk's Office using the CM/ECF System for filing on all attorneys
26 of records and any nonparties who have requested notice.

27 I hereby certify that on _____, I served the attached document by mail on
28 the following, who are not registered participants of the CM/ECF System:

By /s/ A. Saldivar

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

OLD REPUBLIC INSURANCE
COMPANY, a Pennsylvania corporation,

Plaintiff

vs.

CITY PLAN DEVELOPMENT, INC. dba
SAVI CONSTRUCTION, a Nevada
corporation; and ERNESTO J. SAVINO
and CYNTHIA WILSON aka CYNTHIA
SAVINO, Nevada individuals and
individually and as husband and wife,

Defendants

No. 2:16-cv-00903

**ORDER GRANTING STIPULATED
MOTION TO CONTINUE BRIEFING
SCHEDULE IN RESPONSE TO
OCTOBER 26, 2016 ORDER TO
SHOW CAUSE**

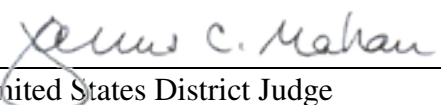
(First Request)

Pursuant to the parties' Stipulated Motion to Continue Briefing Schedule in Response to the Court's October 26, 2016 Order to Show Cause ("Order"), and good cause appearing therefor;

IT IS HEREBY ORDERED that the time for Plaintiff Old Republic Insurance Company to file its response to the Court's Order [ECF No. 60; filed on October 26, 2016] (currently due November 9, 2016) is continued to November 16, 2016.

IT IS HEREBY FURTHER ORDERED that Defendants shall have seven days thereafter to file a response. No reply shall be filed.

Dated November 9, 2016.


United States District Judge