1 2 3 4 5 6 7 8 9 10		E COMPANY ES DISTRICT COURT T OF NEVADA) CASE NO.: 2:16-cv-01958-JAD-VCF
 11 12 13 14 15 16 17 18 19 20 21 	partnership, Plaintiff, vs. NAVIGATORS SPECIALTY INSURANCE COMPANY, a New York corporation; EVEREST NATIONAL INSURANCE COMPANY, a Delaware corporation; INTERSTATE FIRE & CASUALTY COMPANY, an Illinois corporation; LEXINGTON INSURANCE COMPANY, a Delaware corporation; FEDERAL INSURANCE COMPANY, an Indiana corporation; and UNDERWRITERS AT LLOYDS LONDON, an England corporation; ST. PAUL FIRE AND MARINE INSURANCE COMPANY, a Connecticut corporation,	<pre> STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING TO EVEREST NATIONAL INSURANCE COMPANY'S CROSS-CLAIM (First Request) (First Request)) } </pre>
22	Defendants.)))
26 27	Defendant and Cross-defendant St. Paul Fire and Marine Insurance Company ("St. Paul"), by and through its counsel of record, Ramiro Morales, of the Law Offices of Morales Fierro & Reeves, and Defendant, Counterclaimant and Cross-claimant Everest National Insurance Company ("Everest"), by and through its counsel of record, Theodore J. Kurtz, of Selman Breitman LLP, hereby stipulate to extend the deadline for St. Paul's filing of a response to Everest's Cross-claim. Currently pending before the Court is	
	STIPULATION AND [PROPOSED] ORDER	1 CASE NO: 2:16-cv-01958-JAD-VCF Dockets.Just

1	St. Paul's Motion to Dismiss Plaintiff Centex's complaint for lack of subject matter jurisdiction. In light of		
2	St. Paul's pending Motion to Dismiss, Everest and St. Paul hereby stipulate and agree that St. Paul's time to		
3	respond to Everest's complaint shall be extended such that St. Paul's response to Everest's cross-claim will		
4	be due 14 days from the date of entry of the Court's order ruling on St. Paul's Motion to Dismiss.		
5	This is the first stipulation for the extension of Federal's time to respond to Everest's Cross-claim.		
6	DATED: January 30, 2017 M	ORALES FIERRO & REEVES	
7			
8	Ву	/s/ Ramiro Morales	
9		Ramiro Morales (NV Bar No. 7101) 600 South Tonopah Drive, Suite 300	
10		Las Vegas, NV 89106 Telephone: (702) 699-7822	
11	At	torneys for Defendant and Cross-defendant	
12	ST	. PAUL FIRE AND MARINE INSURANCE OMPANY	
13			
14	DATED: January 30, 2017 SE	ELMAN BREITMAN LLP	
15			
16	Ву	<i>/s/ Theodore J. Kurtz</i> Theodore J. Kurtz (NV Bar No. 1344)	
17		3993 Howard Hughes Parkway, Suite 200 Las Vegas, NV 89169	
18		Telephone: (702) 430-5902	
19		torneys for Defendant, Counterclaimant and Cross-	
20		uimant EVEREST NATIONAL INSURANCE OMPANY	
21			
22	[PROPOSED] ORDER		
23	IT IS SO ORDERED: Defendant and Cross-defendant St. Paul Fire and Marine Insurance		
24	Company's response to Everest National Insurance Company's Cross-claim is due 14 days after entry of the		
25	Court's order ruling on St. Paul's pending Motion to Dismiss Plaintiff Centex's complaint for lack of subject		
26	matter jurisdiction.	a de la la	
27	Dated:	Contractor	
28	UN	NITED STATES MAGISTRATE JUDGE	
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	STIPULATION AND [PROPOSED] ORDER	CASE NO: 2:16-cv-01958-JAD-VCF	