

Gordon & Rees LLP
300 S. Fourth St.
Suite 1550
Las Vegas, NV 89101

1 ROBERT S. LARSEN (SBN: 7785)
PHIL W. SU (SBN: 10450)
2 GORDON & REES LLP
300 S. Fourth Street, Suite 1550
3 Las Vegas, NV 89101
Telephone: (702) 577-9300
4 Facsimile: (702) 255-2858
rlarsen@gordonrees.com
5 psu@gordonrees.com
6 Attorneys for Defendants
COX ENTERPRISES, INC. and
7 AETNA LIFE INSURANCE COMPANY

8 JULIE A. MERSCH (SBN: 4695)
LAW OFFICE OF JULIE A. MERSCH
9 701 S. 7th Street
Las Vegas, NV 89101
10 Telephone: (702) 387-5868
Facsimile: (702) 387-0109
11 jam@merschlaw.com

12 Attorney for Plaintiff
TODD TOLBERT

13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

16	TODD TOLBERT,)	CASE NO. 2:16-cv-02223-JAD-PAL
17)	
17	Plaintiff,)	JOINT STIPULATION TO EXTEND
18)	TIME TO RESPOND TO COMPLAINT
18	vs.)	
19	COX ENTERPRISES, INC., as Plan)	Complaint served on Cox Enterprises,
20	Administrator of the Cox Enterprises, Inc.)	Inc.: September 22, 2016
20	Long-Term Disability Coverage Plan;)	
21	AETNA LIFE INSURANCE COMPANY,)	Current response date for Cox
21	as Claims Administrator for the Cox)	Enterprises, Inc.: October 13, 2016
22	Enterprises, Inc. Long-Term Disability)	
22	Coverage Plan; DOES I through V; and)	Complaint served on Aetna Life
23	ROE CORPORATIONS I through V,)	Insurance Company: October 3, 2016
23	inclusive,)	
24)	Current response date for Aetna Life
24	Defendants.)	Insurance Company: October 24, 2016
25)	New response date: November 3, 2016
25)	
26)	Complaint Filed: September 21, 2016
26)	
27)	

1 **TO THE HONORABLE COURT:**

2 Plaintiff Todd Tolbert (“Plaintiff”) and Defendants Cox Enterprises, Inc. (“Cox
3 Enterprises”) and Aetna Life Insurance Company (“Aetna”) (Cox and Aetna are collectively
4 referred to herein as “Defendants”) (Plaintiff and Defendants are collectively referred to herein
5 as the “Parties”), by and through their counsel of record, hereby agree and stipulate to the
6 following:

- 7 1) Plaintiff filed his Complaint on September 21, 2016.
- 8 2) Plaintiff served his Complaint on Cox Enterprises in this matter on September 22,
9 2016.
- 10 3) Plaintiff served his Complaint on Aetna in this matter on October 3, 2016.
- 11 4) Cox Enterprises’ deadline to respond to Plaintiff’s Complaint is currently October
12 13, 2016.
- 13 5) Aetna’s deadline to respond to Plaintiff’s Complaint is currently October 24,
14 2016.
- 15 6) In order to provide Cox Enterprises sufficient time to prepare its response to
16 Plaintiff’s Complaint, Plaintiff has granted Cox Enterprises an additional 3 weeks from the
17 original date, until and through November 3, 2016, to file its response to his Complaint.
- 18 7) In order to provide Aetna sufficient time to prepare its response to Plaintiff’s
19 Complaint, Plaintiff has granted Aetna an additional ten days from the original date, until and
20 through November 3, 2016, to file its response to his Complaint.

21 ///
22 ///
23 ///
24 ///
25 ///
26 ///
27 ///
28 ///

Gordon & Rees LLP
300 S. Fourth St.
Suite 1550
Las Vegas, NV 89101

1 8) Thus, the Parties hereby stipulate and agree that Defendants shall have until and
2 through November 3, 2016 to file their response to Plaintiff's Complaint.

3 Dated: October 11, 2016

GORDON & REES LLP

4

By: /s/ Phil W. Su

Robert S. Larsen (SBN 7785)
Phil W. Su (SBN 10450)
300 S. Fourth Street, Suite 1550
Las Vegas, NV 89101
Attorneys for Defendants
COX ENTERPRISES, INC; and
AETNA LIFE INSURANCE COMPANY

5

6

7

8

9 Dated: October 11, 2016

LAW OFFICE OF JULIE A. MERSCH

10

By: /s/ Julie A. Mersch

Julie A. Mersch (SBN 4695)
701 S. 7th Street
Las Vegas, NV 89101
Attorney for Plaintiff
TODD TOLBERT

11

12

13

14

15

IT IS SO ORDERED:

16

17

Dated this 12th day of October, 2016.

18

19


UNITED STATES MAGISTRATE JUDGE

20

21

22

23

24

25

26

27

28