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12 Attorney for Plaintiff
13 TODD TOLBERT

14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 TODD TOLBERT,)
17)
18) Plaintiff,)
19)
20) vs.)
21)
22) COX ENTERPRISES, INC., as Plan)
23) Administrator of the Cox Enterprises, Inc.)
24) Long-Term Disability Coverage Plan;)
25) AETNA LIFE INSURANCE COMPANY,)
26) as Claims Administrator for the Cox)
27) Enterprises, Inc. Long-Term Disability)
28) Coverage Plan; DOES I through V; and)
) ROE CORPORATIONS I through V,)
) inclusive,)
)
) Defendants.)

CASE NO. 2:16-cv-02223-JAD-PAL
JOINT STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT
Complaint served on Cox Enterprises, Inc.: September 22, 2016
Current response date for Cox Enterprises, Inc.: October 13, 2016
Complaint served on Aetna Life Insurance Company: October 3, 2016
Current response date for Aetna Life Insurance Company: October 24, 2016
New response date: November 3, 2016
Complaint Filed: September 21, 2016

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.

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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

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5 By: /s/ Phil W. Su

Robert S. Larsen (SBN 7785)
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Attorneys for Defendants
COX ENTERPRISES, INC; and
AETNA LIFE INSURANCE COMPANY

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10 Dated: October 11, 2016

LAW OFFICE OF JULIE A. MERSCH

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12 By: /s/ Julie A. Mersch

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

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IT IS SO ORDERED:

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Dated this 12th day of October, 2016.

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UNITED STATES MAGISTRATE JUDGE

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