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7 COX ENTERPRISES, INC. and
AETNA LIFE INSURANCE COMPANY

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Attorney for Plaintiff
TODD TOLBERT

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TODD TOLBERT,) CASE NO. 2:16-cv-02223-JAD-PAL
Plaintiff,)
vs.)
COX ENTERPRISES, INC., as Plan)
Administrator of the Cox Enterprises, Inc.)
Long-Term Disability Coverage Plan;)
AETNA LIFE INSURANCE COMPANY,)
as Claims Administrator for the Cox)
Enterprises, Inc. Long-Term Disability)
Coverage Plan; DOES I through V; and)
ROE CORPORATIONS I through V,)
inclusive,)
Defendants.)
) 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

4 By: /s/ Phil W. Su

5 Robert S. Larsen (SBN 7785)
6 Phil W. Su (SBN 10450)
7 300 S. Fourth Street, Suite 1550
8 Las Vegas, NV 89101
9 Attorneys for Defendants
10 COX ENTERPRISES, INC; and
11 AETNA LIFE INSURANCE COMPANY

12 Dated: October 11, 2016

LAW OFFICE OF JULIE A. MERSCH

13 By: /s/ Julie A. Mersch

14 Julie A. Mersch (SBN 4695)
15 701 S. 7th Street
16 Las Vegas, NV 89101
17 Attorney for Plaintiff
18 TODD TOLBERT

19 **IT IS SO ORDERED:**

20 Dated this 12th day of October, 2016.

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22 UNITED STATES MAGISTRATE JUDGE