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Attorneys for Tokio Marine HCC dba American Contractors Indemnity Company

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Case No.: 2:16-cv-03003

TRUSTEES OF THE BRICKLAYERS &
ALLIED CRAFTWORKERS LOCAL 13
DEFINED CONTRIBUTION PENSION TRUST
FOR SOUTHERN NEVADA; TRUSTEES OF
THE BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 HEALTH
BENEFITS FUND; TRUSTEES OF THE
BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 VACATION
FUND; BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 NEVADA;
TRUSTEES OF THE BRICKLAYERS &
TROWEL TRADES INTERNATIONAL
PENSION FUND; TRUSTEES OF THE
BRICKLAYERS & TROWEL TRADES
INTERNATIONAL HEALTH FUND; and
TRUSTEES OF THE INTERNATIONAL
MASONRY INSTITUTE,

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE
AMERICAN CONTRACTORS
INDEMNITY COMPANY’S OPPOSITION
BRIEF TO PLAINTIFFS’ MOTION FOR
SUMMARY JUDGMENT [ECF NO. 11]
(FIRST REQUEST)**

Plaintiffs,

vs.

TOKIO MARINE HCC dba AMERICAN
CONTRACTORS INDEMNITY COMPANY, a
California insurance corporation; DOES 1
THROUGH 10, and ROE CORPORATIONS 1
THROUGH 10, inclusive,

Defendants.

1 Defendant American Contractors Indemnity Company (“ACIC”), by and through its
2 undersigned counsel and Plaintiffs, by and through their undersigned counsel, hereby present this
3 Stipulation For Extension Of Time To File American Contractors Indemnity Company’s Opposition
4 Brief To Plaintiffs’ Motion For Summary Judgment filed on July 12, 2017 [ECF NO. 11] (First
5 Request). This stipulation to extend the time to respond is made pursuant to LR IA 6-1.

6 Defendant ACIC requests this extension for the following reasons:

- 7 1. ACIC was only made aware of the pending motion for summary judgment on or about
8 July 27, 2017, after it contacted The Faux Law Group to learn of the status of this
9 litigation, after ACIC’s present counsel, Aaron Aquino, Esq. failed to advise ACIC of the
10 status of this litigation.
- 11 2. The extension is necessary for ACIC to evaluate the merits of the motion and to further
12 assess this case for settlement purposes.
- 13 3. ACIC has not requested any other extensions in this case.

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1 ACIC requests an additional 14 days to respond to Plaintiffs' Motion for Summary Judgment
2 to August 16, 2017.

3 Dated this 15th day of August, 2017.

4 THE FAUX LAW GROUP

THE URBAN LAW FIRM

5
6 /s/ Kurt C. Faux
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/s/ Nathan R. Ring (with permission)
MICHAEL A. URBAN, ESQ.
Nevada Bar No. 003875
NATHAN R. RING, ESQ.
Nevada Bar No. 12078
4270 S. Decatur Blvd., Suite A-9
Las Vegas, NV 89103
Attorneys for Plaintiffs

11
12 **IT SO ORDERED.**

13 
14 UNITED STATES DISTRICT COURT JUDGE

15 DATE: August 17, 2017

CERTIFICATE OF SERVICE

The undersigned, an employee of The Faux Law Group, hereby certifies that on the ____ day of August, 2017, I served a copy of the foregoing document, **STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE AMERICAN CONTRACTORS INDEMNITY COMPANY’S OPPOSITION BRIEF TO PLAINTIFFS’ MOTION FOR SUMMARY JUDGMENT [ECF NO. 11] (FIRST REQUEST)** by the Nevada’s electronic filing system addressed to all parties on the e-service list:

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Nathan R. Ring, Esq.
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By: _____
An employee of THE FAUX LAW GROUP

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