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8 Attorneys for Plaintiff AIG SPECIALTY INSURANCE COMPANY F/K/A CHARTIS  
 9 SPECIALTY INSURANCE COMPANY AND ALSO AMERICAN INTERNATIONAL  
 10 SPECIALTY LINES INSURANCE COMPANY

11 **UNITED STATES DISTRICT COURT**  
 12 **DISTRICT OF NEVADA**

13 AIG SPECIALTY INSURANCE COMPANY  
 F/K/A CHARTIS SPECIALTY INSURANCE  
 14 COMPANY AND ALSO AMERICAN  
 15 INTERNATIONAL SPECIALTY LINES  
 INSURANCE COMPANY, an Illinois  
 16 Corporation,  
 17 Plaintiff,  
 18 vs.  
 19  
 20 LIBERTY MUTUAL FIRE INSURANCE  
 COMPANY, a Massachusetts Corporation,  
 21 Defendant.  
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CASE NO. 2:17-cv-01260-APG-NJK  
**STIPULATION AND ORDER  
 EXTENDING TIME FOR AIG  
 SPECIALTY INSURANCE COMPANY  
 F/K/A CHARTIS SPECIALTY  
 INSURANCE COMPANY AND ALSO  
 AMERICAN INTERNATIONAL  
 SPECIALTY LINES INSURANCE  
 COMPANY’S TO FILE OPPOSITION TO  
 LIBERTY MUTUAL’S RENEWED  
 MOTION TO STAY FEDERAL COURT  
 DECLARATORY JUDGMENT ACTION  
 PENDING RESOLUTION OF  
 UNDERLYING COURT ACTION**  
**(FIRST REQUEST)**

24 Plaintiff AIG SPECIALTY INSURANCE COMPANY F/K/A CHARTIS SPECIALTY  
 25 INSURANCE COMPANY AND ALSO AMERICAN INTERNATIONAL SPECIALTY LINES  
 26 INSURANCE COMPANY (“AISLIC”) and Defendant, LIBERTY MUTUAL FIRE INSURANCE  
 27 COMPANY (“Liberty” and collectively, with AISLIC the “Parties”), by and through their  
 28 ///

1 attorneys of record, and pursuant to Local Rules 6-1(a)(b)(c) and 6-2, hereby stipulate and agree as  
2 follows:

3 WHEREAS, Defendant filed its Renewed Motion to Stay (**ECF No. 51**) on August 9, 2017;

4 WHEREAS, Plaintiff has requested, and Defendant has consented to, an extension of time  
5 to respond to Defendant's Renewed Motion to Stay to August 30, 2017;

6 WHEREAS, Plaintiff's handling attorneys are either out of the country or are otherwise  
7 unavailable during the time frame before the opposition's current due date;

8 WHEREAS, Fed.R.Civ.P. 6(b) requires the Court to approve an extension of time for  
9 Plaintiff to file a response, and therefore the Parties collectively request the Court approve the  
10 stipulation, as set forth below:

11 a. This is the Parties' first stipulation for enlargement of time to answer Defendant's  
12 Renewed Motion to Stay;

13 b. The Parties stipulate and agree that the deadline for Plaintiff to file a response to  
14 Defendant's Renewed Motion to Stay shall be extended to August 30, 2017.

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c. This stipulation is not made for purposes of delay.

DATED: August 15, 2017

HEROLD & SAGER

By: /s/ Andrew D. Herold  
ANDREW D. HEROLD, ESQ.  
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JOSHUA A. ZLOTLOW, ESQ.  
Nevada Bar No. 11333  
Attorneys for Plaintiff AIG SPECIALTY  
INSURANCE COMPANY F/K/A CHARTIS  
SPECIALTY INSURANCE COMPANY AND  
ALSO AMERICAN INTERNATIONAL  
SPECIALTY LINES INSURANCE COMPANY

DATED: August 15, 2017

DUANE MORRIS, LLP

By: /s/ Dominica C. Anderson  
DOMINICA C. ANDERSON, ESQ. SBN 2988  
DANIEL B. HEIDTKE, ESQ. SBN 12975  
Attorneys for Defendant LIBERTY MUTUAL  
FIRE INSURANCE COMPANY

IT IS SO ORDERED August 16 \_\_\_\_\_, 2017.

  
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U.S. DISTRICT MAGISTRATE JUDGE