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12 Attorneys for Plaintiff AIG SPECIALTY INSURANCE COMPANY F/K/A CHARTIS
13 SPECIALTY INSURANCE COMPANY AND ALSO AMERICAN INTERNATIONAL
14 SPECIALTY LINES INSURANCE COMPANY

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17 **UNITED STATES DISTRICT COURT**

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19 **DISTRICT OF NEVADA**

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AIG SPECIALTY INSURANCE COMPANY
F/K/A CHARTIS SPECIALTY INSURANCE
COMPANY AND ALSO AMERICAN
INTERNATIONAL SPECIALTY LINES
INSURANCE COMPANY, an Illinois
Corporation,

Plaintiff,

vs.

LIBERTY MUTUAL FIRE INSURANCE
COMPANY, a Massachusetts Corporation,

Defendant.

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)**

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

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STIPULATION EXTENDING TIME TO FILE OPPOSITION TO
LIBERTY MUTUAL'S RENEWED MOTION TO STAY

CASE NO. 2:17-cv-01260-APG-NJK

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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1 c. This stipulation is not made for purposes of delay.
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DATED: August 15, 2017

HEROLD & SAGER

By: /s/ Andrew D. Herold
ANDREW D. HEROLD, ESQ.
Nevada Bar No. 7378
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.


U.S. DISTRICT MAGISTRATE JUDGE