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6 Attorneys for Plaintiffs *Liberty Mutual Fire Insurance Company*

7  
 8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

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

13 Plaintiffs,

14 vs.

15 LIBERTY MUTUAL FIRE INSURANCE  
 COMPANY, a Massachusetts Corporation; and  
 16 DOES 1 through 100, inclusive,

17 Defendants.

Case No.: 2:17-cv-01260-APG-NJK

**STIPULATION AND ORDER  
 EXTENDING TIME FOR BRIEFING ON  
 PLAINTIFF'S MOTION TO STAY  
 DISCOVERY [ECF NO. 74]**

**(FIRST REQUEST)**

18 Plaintiff, AIG SPECIALTY INSURANCE COMPANY F/K/A CHARTIS SPECIALTY  
 19 INSURANCE COMPANY AND ALSO AMERICAN INTERNATIONAL SPECIALTY LINES  
 20 INSURANCE COMPANY ("Plaintiff"), and Defendant, LIBERTY MUTUAL FIRE INSURANCE  
 21 COMPANY ("Defendant" and collectively, with Plaintiff the "Parties"), by and through their  
 22 respective counsel of record, and pursuant to Local Rules 6-1(a) and 6-2, and Federal Rule of Civil  
 23 Procedure Rule 6, hereby stipulate and agree as follows:

24 WHEREAS, on October 25, 2017, the Parties filed a joint discovery plan on October 25, 2017  
 25 (ECF No. 71);

26 WHEREAS, on October 25, 2017, this Court denied the Parties' discovery plan and ordered  
 27 Plaintiff to file, within 14 days of the order, a motion to stay discovery addressing the pertinent  
 28 standards (ECF No. 72);

1 WHEREAS, on November 9, 2017, Plaintiff filed a Motion to Stay Discovery (ECF No. 74);

2 WHEREAS, Defendant’s Opposition to Plaintiff’s Motion to Stay Discovery, if any, is  
3 currently due November 27, 2017;

4 WHEREAS, Plaintiff’s Reply in Support of its Motion to Stay Discovery, if any, is due  
5 December 4, 2017;

6 WHEREAS, Plaintiff and Defendant have been in discussion concerning a possible limited  
7 stipulation as to a stay of discovery in this matter. Consequently, an additional one (1) day extension  
8 would allow the Parties to continue these meaningful discussions which may relieve this Court of the  
9 burden of having to consider additional briefing; and

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

- 12 a. This is the Parties’ first stipulation for an enlargement of time;
- 13 b. The Parties stipulate and agree that the deadline for Defendant to file a Response to  
14 Plaintiff’s Motion to Stay shall be extended to **November 28, 2017** and Plaintiff’s deadline to file a  
15 Reply in Support shall be extended to **December 5, 2017**; and
- 16 c. This stipulation is not made for purposes of delay.

17 IT IS SO STIPULATED.

18 **DUANE MORRIS LLP**

**HEROLD & SAGER**

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20 By: /s/ Daniel B. Heidtke  
Dominica C. Anderson (SBN 2988)  
Daniel B. Heidtke (SBN 12975)

By: /s/ Joshua A. Zlotlow  
Andrew D. Herold (SBN 7378)  
Joshua A. Zlotlow (SBN 11333)

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22 Attorneys for Defendant *Liberty Mutual Fire  
Insurance Company*

Attorneys for Plaintiff *AIG Specialty Insurance  
Co. f/k/a Chartis Specialty Insurance Co. and  
also American International Specialty Lines  
Insurance Co.*

23  
24 **IT IS SO ORDERED** Dated: November 28, 2017.

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United States Magistrate Judge