

DENTONS US LLP
ONE MARKET PLAZA, SPEAR TOWER, 24TH FLOOR
SAN FRANCISCO, CALIFORNIA 94105
(415) 267-4000

1 WADE HANSARD, Nevada Bar No. 8104
wade.hansard@mccormickbarstow.com
2 MCCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH
3 8337 West Sunset Road, Suite 350
Las Vegas, NV 891113
4 Telephone: (702) 949-1100
Facsimile: (702) 949-1101
5

6 DOUGLAS A. SCULLION (pro hac vice forthcoming)
doug.scullion@dentons.com
7 ANNA S. YOUSSEFI (pro hac vice forthcoming)
anna.youssefi@dentons.com
8 DENTONS US LLP
One Market Plaza, Spear Tower, 24th Floor
San Francisco, California 94105
9 Telephone: (415) 267-4000
Facsimile: (415) 267 4198
10

11 ATTORNEYS FOR DEFENDANT
THE LINCOLN NATIONAL LIFE INSURANCE
COMPANY
12

13 UNITED STATES DISTRICT COURT FOR
14 DISTRICT OF NEVADA

15 VALERIE MOTA,
16 Plaintiff,
17 v.
18 THE LINCOLN NATIONAL LIFE
19 INSURANCE COMPANY,
20 Defendant.
21

Case No. 2:17-CV-1405-APG-CWH
**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND
TO COMPLAINT**
(First Request)
Current Response Date: 06-13-2017
New Response Date: 07-11-2017

22
23 Pursuant to Local Rule IA 6-1, Plaintiff Valerie Mota and defendant The Lincoln National
24 Life Insurance Company (“Lincoln”) (together, the “Parties”) hereby stipulate as follows:

25 WHEREAS, Plaintiff filed an initial Complaint in this case on May 18, 2017;
26 WHEREAS, Plaintiff personally served Lincoln with the Complaint on May 23, 2017.
27 WHEREAS, Lincoln has requested and Plaintiff has agreed to extend Lincoln’s deadline
28

1 to respond to the Complaint from June 13, 2017 to July 11, 2017;

2 WHEREAS, this is the first stipulation for an extension of time to respond to the
3 Complaint;

4 IT IS HEREBY STIPULATED AND AGREED, and the Parties request that Lincoln may
5 file its responsive pleading in this matter no later than July 11, 2017.

6 IT IS SO STIPULATED.

7 Dated: June 12, 2017

MCCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH

8

9

10

By: /s/ Wade Hansard

Wade Hansard, Esq.
Nevada Bar No.: 008104
8337 W. Sunset Rd., Ste. 350
Las Vegas, NV 89113
(702) 949-1100
Attorneys for Defendant THE LINCOLN
NATIONAL LIFE INSURANCE
COMPANY

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Dated: June 12, 2017

ERISA LAW CENTER

By: /s/ Robert Rosati

Robert J. Rosati
(pro hac vice)
6485 N. Palm Ave., Ste. 105
Fresno, CA 93704
(559) 478-4119
Attorneys for Plaintiff VALERIE MOTA

Dated: June 12, 2017

HATFIELD LAW ASSOCIATES

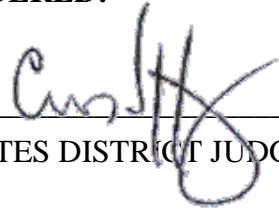
By: /s/ Trevor Hatfield

Trevor Hatfield, Esq.
Nevada Bar No.: 7373
703 S. Eighth Street
Las Vegas, NV 89101
(702) 388-4469
Attorneys for Plaintiff VALERIE MOTA

DENTONS US LLP
ONE MARKET PLAZA, SPEAR TOWER, 24TH FLOOR
SAN FRANCISCO, CALIFORNIA 94105
(415) 267-4000

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

DATED: June 13, 2017

103914417