1 2 3 4	Anna Maria Martin (Nevada Bar No. 7079) amartin@mmhllp.com MESERVE, MUMPER & HUGHES LLP 800 Wilshire Boulevard, Suite 500 Los Angeles, California 90017-2611 Telephone: (213) 620-0300 Facsimile: (213) 625-1930		
5 6	Wendy L. Furman Wendy.furman@emhllp.com EDISON, MCDOWELL & HETHERINGTON LLP 2101 N.W. Corporate Boulevard Suite 316 Boca Raton, Florida 33431 Telephone: (561) 994-4311 Facsimile: (561) 982-8985 PRO HAC VICE APPLICATION PENDING		
7 8			
9			
10	Attorneys for Defendant THE LINCOLN NATIONAL LIFE INSURANCE COMPANY		
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12	CONTINUED ON CECOND BACE		
13	CONTINUED ON SECOND PAGE		
14 15	UNITED STATES DISTRICT COURT		
	DISTRICT OF NEVADA		
16			
17	RICK ERDMANN,	Case No. 2:17-cv-2383-JAD-PAL	
18 19	Plaintiff,	STIPULATION TO EXTEND TIME FOR DEFENDANT TO	
	vs.	RESPOND TO PLAINTIFF'S	
20 21	THE LINCOLN NATIONAL LIFE INSURANCE COMPANY,	COMPLAINT	
22	Defendant.		
23			
24			
25			
26			
27			
28			
	1	Case No. 2:17-cv-2383-JAD-P.	

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Robert J. Rosati (Bar No. 112006)
    robert@erisalg.com
    6485 N. Palm Avenue, Suite 105
    Fresno, California 93704
    Telephone (559) 478-4119 Facsimile: (559) 478-5939
    PRO HAC VICE APPLICATION PENDING
    Trevor Hatfield (Nevada Bar No. 7373)
    thatfield@hatfieldlawassociates.com
    HATFIELD LAW ASSOCIATES
    703 S. Eighth Street
    Las Vegas, NV 89101
    Telephone: (702) 388-4469
    Facsimile: (702) 684-5147
    Attorneys for Plaintiff
10
    RICK ERDMANN
11
12
         IT IS HEREBY STIPULATED by and between the parties hereto through
13
    their respective attorneys that defendant THE LINCOLN NATIONAL LIFE
    INSURANCE COMPANY may have an additional three weeks within which to
15
    answer or otherwise respond to plaintiff's complaint. The last day for defendant to
17
    answer or otherwise respond to plaintiff's complaint is November 3, 2017.
18
          Good cause exists for this request as counsel for defendant has only recently
19
   been retained in this matter and needs additional time to complete a full review
20
    before providing an answer or otherwise respond to plaintiff's complaint.
21
   extension will not affect any existing deadline already scheduled by the Court. This
22
   is the first extension to answer or otherwise respond to plaintiff's complaint.
23
          This document is being electronically filed through the Court's ECF System.
    In this regard, counsel for Defendant hereby attests that (1) the content of this
25
    document is acceptable to all persons required to sign the document, (2) Plaintiff has
26 ///
27
    ///
28 | / / /
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159156.1

1	concurred with the filing of this document; and (3) a record supporting this	
2	concurrence is available for inspection or production if so ordered.	
3	Dated: October 13, 2017	Robert J. Rosati
4	Buted. Getober 13, 2017	Trevor Hatfield
5		Hatfield Law Associates
6		By: /s/ Trevor Hatfield Trevor Hatfield
7		Attorneys for Plaintiff
8		RICK ERDMANN
9	Dated: October 13, 2017	Anna Maria Martin
10		MESERVE, MUMPER & HUGHES LLP
12		Wendy L. Furman EDISON, MCDOWELL & HETHERINGTON
13		LLP
14		By:/s/ Anna Maria Martin
15		Anna Maria Martin Attorneys for Defendant
16		THE LINCOLN NATIONAL LIFE INSURANCE COMPANY
17		
18		
19	IT IS SO ORDERED this 18th day	
20	of October, 2017.	
21	Peggy A. Leen United States Magistrate Judge	_
22		
23	Officed Otates Magistrate sudge	
24		
25		
26		
27		
28		