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5 Attorneys for Third Party Defendants,
PROBUILDERS SPECIALTY INSURANCE
6 COMPANY, RRG

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10
11 CENTEX HOMES, a Nevada general
partnership,

12 Plaintiffs,

13 vs.

14 ST. PAUL FIRE AND MARINE
15 INSURANCE COMPANY, a Connecticut
corporation; EVEREST NATIONAL
16 INSURANCE COMPANY, a Delaware
corporation; INTERSTATE FIRE &
17 CASUALTY COMPANY, an Illinois
corporation; LEXINGTON INSURANCE
18 COMPANY, a Delaware corporation;
FEDERAL INSURANCE COMPANY, an
19 Indiana corporation,

20 Defendants.

21 ST. PAUL FIRE AND MARINE
22 INSURANCE COMPANY,

23 Third Party Plaintiff,

24 vs.

25 UNDERWRITERS AT LLOYDS LONDON;
PROBUILDERS SPECIALTY INSURANCE
26 COMPANY, RRG; NEW HAMPSHIRE
INSURANCE COMPANY; FIRST
27 SPECIALTY INSURANCE COMPANY;
ARCH SPECIALTY INSURANCE
28

CASE NO. 2:17-CV-02407-JAD-VCF

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO FILE A
RESPONSIVE PLEADING TO ST. PAUL
FIRE AND MARINE INSURANCE
COMPANY'S THIRD PARTY
COMPLAINT [FIRST REQUEST]**

Action Filed: 9/14/17
Trial Date: None Set

1 COMPANY; IRONSHORE SPECIALTY
2 INSURANCE COMPANY; ROCKHILL
INSURANCE COMPANY; and FIREMAN'S
FUND INSURANCE COMPANY,

3 Third Party Defendants.
4

5 AND RELATED CROSS-ACTIONS
6

7 Defendant and Third-Party Plaintiff ST. PAUL FIRE AND MARINE INSURANCE COMPANY
8 ("St. Paul") and Third-Party Defendant PROBUILDERS SPECIALTY INSURANCE COMPANY RRG,
9 A RISK RETENTION GROUP ("Probuilders") hereby agree and stipulate to extend the deadline for
10 Probuilders to answer or otherwise respond to the Third-Party Complaint from January 11, 2018, to
11 February 2, 2018. This is the first request to extend this particular deadline.

12 On November 13, 2017, St. Paul filed its Third-Party Complaint naming Probuilders and several
13 other entities as defendants. ECF No. 38. The Summons and Complaint were served on Probuilders on
14 December 21, 2017, via the Nevada Department of Business and Industry – Division of Insurance. ECF
15 No. 58. Therefore, pursuant to Rule 12(a) of the Federal Rules of Civil Procedure, Probuilders' response
16 to the Third- Party Complaint was originally due on January 11, 2018.

17 This extension of time is necessary because, due to now resolved conflict issues, counsel for
18 Probuilders was only recently retained. Probuilders and St. Paul are currently attempting to resolve the
19 claims raised by the Third-Party Complaint against Probuilders before incurring additional litigation
20 costs. A case management order has not yet been entered, thus this stipulation to extend Probuilders'
21 time to respond to the Third-Party Complaint will not affect any current deadlines in this action. This
22 stipulation is entered into in good faith and is not intended to unduly delay the proceedings.

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1 Accordingly, the parties request that an order be entered extending the deadline for Probuilders to
2 respond to the Third-Party Complaint from January 11, 2018, to February 2, 2018.

3
4 DATED: January 24, 2018

MORALES FIERRO & REEVES

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6 By: s/s Ramiro Morales
7 RAMIRO MORALES, ESQ.
8 rmorales@mfrlegal.com
9 Attorneys for Defendant and Third Party Plaintiff
10 ST. PAUL FIRE and MARINE INSURANCE
11 COMPANY

12
13 DATED: January 24, 2018

**WILSON ELSER MOSKOWITZ EDELMAN &
DICKER LLP**

14 By: s/s John H. Podesta
15 JOHN H. PODESTA, ESQ.
16 john.podesta@wilsonelser.com
17 Attorneys for Third Party Defendant
18 PROBUILERS SPECIALTY INSURANCE
19 COMPANY, RRG

20
21 **ORDER**

22 **IT IS SO ORDERED.**

23 
24 UNITED STATES DISTRICT JUDGE

25 DATED: _____
26 Magistrate

27
28 January 26, 2018