

1 Ann-Martha Andrews
 Nevada Bar No. 007585
 2 Kristina N. Holmstrom
 Nevada Bar No. 010086
 3 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
 Esplanade Center III, Suite 800
 4 2415 East Camelback Road
 Phoenix, AZ 85016
 5 Telephone: 602.778.3700
 Fax: 602.778.3750
 6 ann.andrews@ogletree.com
 kristina.holmstrom@ogletree.com

7 Attorneys for Defendant Canada Life
 8 Assurance Company of America

9 **UNITED STATES DISTRICT COURT**
 10 **FOR THE DISTRICT OF NEVADA**

11 Richard Meccall, DDS,

12 Plaintiff,

13 vs.

14 Canada Life Assurance Company of America;
 15 Does I through V inclusive; and Roes I
 through V, inclusive,

16 Defendants.

Case No.: 2:18-cv-00648-APG-VCF

**STIPULATION TO EXTEND TIME
 TO RESPOND TO COMPLAINT**

(Second Request)

18 Plaintiff Richard Meccall, DDS and defendant Canada Life Assurance Company of
 19 America hereby stipulate and request the Court to extend Canada Life’s deadline to answer
 20 or otherwise respond to Meccall’s Complaint by 14 days, from June 7, 2018 through and
 21 including June 21, 2018. The defendant requested the stipulation, and the plaintiff agreed,
 22 in order to allow defense counsel time to review the claim file, which is quite voluminous,
 23 prepare a responsive pleading to the plaintiff’s detailed Complaint, and then consult with her
 24 client before the deadline.

25 The parties certify that this stipulation was done in good faith and not for the purposes
 26 of delay.

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
 WELLS FARGO TOWER
 SUITE 1500, 3800 HOWARD HUGHES PARKWAY
 LAS VEGAS, NV 89169
 TELEPHONE: 702.369.6800

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

Dated this 1st day of June 2018.

LAW OFFICE OF JULIE A. MERSCH

OGLETREE, DEAKINS, NASH, SMOAK
& STEWART, P.C.

By: /s/ Julie A. Mersch

Julie A. Mersch
Nevada Bar No. 004695
701 South 7th Street
Las Vegas, NV 89101
Telephone: 702.387.5868
Fax: 702.387.0109
jam@merschlaw.com

Attorneys for Plaintiff Richard
Mecall, DDS

By: /s/ Ann-Martha Andrews

Ann-Martha Andrews
Nevada Bar No. 007585
Kristina N. Holmstrom
Nevada Bar No. 010086
Esplanade Center III, Suite 800
2415 East Camelback Road
Phoenix, AZ 85016
Telephone: 602.778.3700
Fax: 602.778.3750
ann.andrews@ogletree.com
kristina.holmstrom@ogletree.com

Attorneys for Defendant Canada Life
Assurance Company of America

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

June 11, 2018

DATED: _____

CERTIFICATE OF SERVICE

I hereby certify that I electronically transmitted the attached document to the Clerk’s Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrant:

Julie A. Mersch, Esq.
Law Office of Julie A. Mersch
701 South 7th Street
Las Vegas, NV 89101

Pursuant to Fed. R. Civ. P. 5(b), I hereby further certify that service of Stipulation to Extend Time to Respond to Complaint was also made by depositing a copy for mailing, first class mail, postage prepaid, at Las Vegas, Nevada to the following:

Julie A. Mersch, Esq.
Law Office of Julie A. Mersch
701 South 7th Street
Las Vegas, NV 89101

DATED this 1st day of June 2018.

/s/ Diane M. Kelly
An Employee of Ogletree, Deakins,
Nash, Smoak & Stewart, P.C.

34307827.1

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
WELLS FARGO TOWER
SUITE 1500, 3800 HOWARD HUGHES PARKWAY
LAS VEGAS, NV 89169
TELEPHONE: 702.369.6800

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