

1 Anthony L. Martin
2 Nevada Bar No. 8177
3 anthony.martin@ogletreedeakins.com
4 Dana B. Salmonson
5 Nevada Bar No. 11180
6 dana.salmonson@ogletreedeakins.com
7 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
8 3800 Howard Hughes Parkway, Suite 1500
9 Las Vegas, NV 89169
10 Telephone: 702.369.6800
11 Fax: 702.369.6888
12 *Attorneys for Defendants UNUM Group and
13 Colonial Life & Accident Insurance Company*

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

11 HEATHER SCHOENWALD, an individual;
TOM KOCH, an individual,

Case No.: 2:20-cv-01948-JCM-BNW

12 Plaintiffs,

13 || vs.

14 UNUM GROUP, a Foreign Corporation;
15 COLONIAL LIFE & ACCIDENT
16 INSURANCE COMPANY, A SUBSIDIARY
17 OF UNUM GROUP, a Foreign Corporation;
SCOTT WEBB, an individual; DOES 1
through 10; ROE CORPORATIONS, 1
through 10,

**STIPULATION AND ORDER FOR AN
EXTENSION OF TIME TO RESPOND TO
PLAINTIFFS' COMPLAINT**

(THIRD REQUEST)

18 Defendants.

Pursuant to LR IA 6-1, LR IA 6-2 and LR 7-1, Plaintiff Heather Schoenwald (“Schoenwald”), Plaintiff Todd Koch (“Koch”) (collectively, “Plaintiffs”), Defendant UNUM Group (“UNUM”), Defendant Colonial Life & Accident Insurance Company (“Colonial Life”), and Defendant Scott Webb (“Webb”) by and through their respective counsel of record, hereby request and stipulate to extend the time for Defendants UNUM and Colonial Life to respond to Plaintiffs’ Complaint (ECF No. 1). UNUM and Colonial Life’s responses to Plaintiffs’ Complaint are currently due December 30, 2020. UNUM and Colonial Life request an extension of time up to and including January 27, 2021 in which to respond as Plaintiff Schoenwald and her counsel have represented that she will be amending her Complaint, and responding to the initial Complaint (ECF No. 1) would be

1 unnecessary.¹ This is the parties' third request for an extension of time. The first request was filed
 2 on November 13, 2020 (ECF No. 6) and granted on November 17, 2020 (ECF No. 7). The second
 3 request was filed on December 8, 2020 (ECF No. 12) and granted on December 11, 2020 (ECF No.
 4 13).

5 This Stipulation is made in good faith and is not intended for purposes of delay.

6 DATED this 30th day of December, 2020. DATED this 30th day of December, 2020.

7 CLAGGETT & SYKES LAW FIRM

8 */s/ Joseph N. Mott*

9 Sean K. Claggett
 Nevada Bar No. 8407
 10 Joseph N. Mott
 Nevada Bar No. 12455
 11 4101 Meadows Lane, Suite 100
 12 Las Vegas, NV 89107
 13 *Attorneys for Plaintiff Heather Schoenwald*

14 DATED this 30th day of December, 2020.

15 LAGOMARSINO LAW

16 */s/ Andre M. Lagomarsino*

17 Andre M. Lagomarsino
 Nevada Bar No. 6711
 18 Daven P. Cameron
 Nevada Bar No. 14179
 19 3005 W. Horizon Ridge Parkway, Suite 241
 Henderson, NV 89052
 20 *Attorneys for Plaintiff Tom Koch*

21 DATED this 30th day of December, 2020.

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

/s/ Dana B. Salmonson

Anthony L. Martin
 Nevada Bar No. 8177
 Dana B. Salmonson
 Nevada Bar No. 11180
 3800 Howard Hughes Parkway, Suite 1500
 Las Vegas, NV 89169
 13 *Attorneys for Defendants UNUM Group and Colonial Life & Accident Insurance Company*

DATED this 30th day of December 2020.

MCNUTT LAW FIRM P.C.

/s/ Daniel R. McNutt

Daniel R. McNutt
 Nevada Bar No. 7815
 Matthew C. Wolf
 Nevada Bar No. 10801
 625 S. Eighth Street
 Las Vegas, NV 89101
 21 *Attorneys for Defendant Scott Webb*

ORDER

IT IS SO ORDERED

DATED: 3:18 pm, January 06, 2021



BRENDA WEKSLER
 UNITED STATES MAGISTRATE JUDGE

1 All parties have agreed that Plaintiffs will be permitted to file an Amended Complaint. The parties
 have further stipulated that no new claims will be added as to decedent Scott Webb and/or his estate.
 The parties will be preparing and filing a subsequent stipulation and order requesting that this Court
 allow Plaintiffs to file an Amended Complaint pursuant to FRCP 15(a)(2).