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Special Administrator of the Estate of
Demetrios A. Dalacas

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 ALLIED WORLD SPECIALTY INS.)
CO., et al.)
11 Plaintiffs,)
12 v.)
13 LISA M. LEE, as Special Administrator of)
the Estate of Demetrios A. Dalacas, et al.,)
14 Defendants.)
15)

CIVIL ACTION NO.: 2:21-CV-00078-JCM-EJY

**STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME
(First Request)**

19 This Stipulation and [Proposed] Order to Extend Time, pursuant to Local Rule IA 6-1
20 (“Stipulation”), is made and entered into by Robert O. McMaster, as Special Administrator of the Estate
21 of Demetrios A. Dalacas (“McMaster”) and Allied World Specialty Insurance Company f/k/a Darwin
22 National Assurance Company and Allied World Insurance Company (“Plaintiff”). This is the first
23 request for an extension of McMaster’s deadline to file a responsive pleading and/or answer. The
24 purpose of this Stipulation is to extend the date for McMaster’s responsive pleading and/or answer to
25 Plaintiff’s Complaint until April 9, 2021, for the following reasons:

26 1. McMaster was appointed as the Special Administrator of the Estate of Demetrios A. Dalacas on
27 November 13, 2020, by order of the Probate Court, District Court, Clark County, Nevada in Case
28 No. P-20-104354-E.

- 1 2. Unbeknownst to McMaster, a prior probate estate for Decedent Demetrios A. Dalacas, had
- 2 already been opened in Case No. P-20-103708-E, whereby Lisa M. Lee (“Lee”) was appointed
- 3 Special Administrator by court order on October 16, 2020.
- 4 3. Subsequently, upon learning of the prior appointment of Lee, McMaster filed a Motion to
- 5 Consolidate and to withdraw from further representation of the Dalacas Probate Estate (the
- 6 “Motion to Consolidate and Withdraw”).
- 7 4. A hearing on the Motion to Consolidate and Withdraw has been scheduled for April 2, 2021.
- 8 5. This Stipulation is necessary to allow the Probate Court to determine the proper party to defend
- 9 or respond to the Complaint.
- 10 6. McMaster and Plaintiff have stipulated that McMaster’s responsive pleading or answer will be
- 11 due on April 9, 2021.

12 **THEREFORE, IT IS SO STIPULATED AND AGREED** that time for Robert O. McMaster
13 to file an answer and/or responsive pleading shall be extended to April 9, 2021.

14 DATED this 17th day of February, 2021

GOLDSMITH & GUYMON, P.C.

22 DATED this 17th day of February, 2021

**WILSON, ELSER, MOSKOWITZ, EDELMAN &
DICKER LLP**

24 IT IS SO ORDERED.

25
26 Raymond J. Zanchi
U.S. MAGISTRATE JUDGE

28 | Dated: February 18, 2021

/s/ Chad C. Butterfield
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