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17 INSURANCE COMPANY

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19 UNITED STATES DISTRICT COURT  
20  
21 DISTRICT OF NEVADA

22 LIBERTY MUTUAL FIRE INSURANCE  
23 COMPANY,

24 Plaintiff,

25 v.

26 ACUITY A MUTUAL INSURANCE  
27 COMPANY and ROYAL REFRIGERATION,  
28 INC.,

Defendants.

Case No. 2:24-cv-00684-JAD-DJA

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE RESPONSES  
TO PLAINTIFF LIBERTY MUTUAL  
FIRE INSURANCE COMPANY'S  
MOTION FOR SUMMARY JUDGMENT  
[DOC. 20] AND DEFENDANT ACUITY  
INSURANCE'S MOTION FOR  
SUMMARY JUDGMENT [DOC. 24]**

**[FIRST REQUEST]**

29 Pursuant to LR IA 6-1, Plaintiff Liberty Mutual Fire Insurance Company ("LIBERTY  
30 MUTUAL") and Defendant Acuity A Mutual Insurance Company ("ACUITY"), by and through  
31 their counsel of record, hereby submit to this Honorable Court this stipulation and request to extend  
32 the time for both parties to file responses to Plaintiff Liberty Mutual Fire Insurance Company's  
33 Motion for Summary Judgment [Doc. 20] (filed on February 13, 2025) and Defendant Acuity  
34 Insurance's Motion for Summary Judgment [Doc. 24] (filed on February 14, 2025). The current  
35 due date for the responses are March 6, 2025 and March 7, 2025. The proposed new due date would  
36 be March 12, 2025 for both responses.

Case No. 2:24-cv-00684-JAD-DJA

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37 STIPULATION TO EXTEND TIME TO FILE RESPONSES TO PLAINTIFF LIBERTY MUTUAL FIRE  
38 INSURANCE COMPANY'S MOTION FOR SUMMARY JUDGMENT [DOC. 20] AND DEFENDANT ACUITY  
39 INSURANCE'S MOTION FOR SUMMARY JUDGMENT [DOC. 24]

The parties respectfully submit that good cause exists for this stipulation based on the following:

1. This is the parties' first request for an extension. Given the complexity of the legal issues the parties mutually wish to fully and comprehensively brief the issues at hand for the Court and submit that an extension of three/four business days will help accomplish that aim.

6 2. The Parties have agreed to stipulate to this extension.

7 3. This request is made in good faith and without intent to cause undue delay.

8       4.     In accordance with LR IA 6-1, this is the first request for an extension of time to file  
9 oppositions to Plaintiff Liberty Mutual Fire Insurance Company's Motion for Summary Judgment  
10 [Doc. 20] and Defendant Acuity Insurance's Motion for Summary Judgment [Doc. 24].

11 DATED this 5<sup>th</sup> day of March, 2025

McCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH LLP

By /s/*Jonathan W. Carlson*  
JONATHAN W. CARLSON, ESQ.  
Nevada Bar No. 10536  
Attorneys for Plaintiff

DATED this 5<sup>th</sup> day of March, 2025

## RESNICK & LOUIS, PC

By /s/Gary R. Guelker  
GARY R. GUELKER, ESQ.  
Nevada Bar No. 10603  
Attorneys for Defendant ACUITY A MUTUAL  
INSURANCE

Based on the parties' stipulation [ECF No. 25] and with good cause appearing, IT IS ORDERED that the deadlines to file responses to Plaintiff Liberty Mutual Fire Insurance Company's Motion for Summary Judgment [Doc. 20] and Defendant Acuity Insurance's Motion for Summary Judgment [Doc. 24] are extended up to and including March 12, 2025.

UNITED STATES DISTRICT COURT JUDGE

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