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Rockhill Insurance Ompanies v. CSAA Insurance Exchange et al

1	Defendant/Counter-Claimant Premier Restoration and Remodel, Inc. ("Premier"), by and		
2	through their undersigned counsel and pursuant to LR IA 6-1, stipulate and request that the		
3	Court order that Plaintiff may have until and including August 22, 2018, by which to file its		
4	Reply in Support of Motion for Judgment on the Pleadings on Rockhill's Amended Complaint.		
5	The underlying Motion for Judgment on the Pleadings (ECF No. 64) was filed on July 25,		
6	2018. Defendant CSAA's Opposition (ECF No. 65) was filed on August 8, 2018. Defendant		
7	Premier's Joinder in CSAA's Opposition (ECF No. 66) was filed on August 9, 2018. Plaintiff's		
8	Reply is presently due on August 15, 2018. This is the first stipulation for an extension of time		
9	to file Plaintiff's Reply.		
10	Plaintiff has requested additional time within which to file its Reply because it is		
11	working diligently to complete written responses and prepare documents responsive to		
12	Defendant CSAA's Request for Production of Documents and Electronically Stored		
13	Information, which is due on August 15, 2018. In addition, counsel for Plaintiff, who is		
14	principally responsible for drafting its Reply in Support of Motion for Judgment on the		
15	Pleadings on Rockhill's Amended Complaint is scheduled to be out of the office during the		
16	week of August 13-18, 2018.		
17			
18	WHEREFORE, the parties stipulate and request that the Court order that Plaintiff may		
19	have until August 22, 2018, by which to file and serve its Reply in Support of Motion for		
20	Judgment on the Pleadings on Rockhill's Amended C	Complaint.	
21	DATED 1: 10 1 CA 2010	DATED 1: 10.1	
22	DATED this 10 day of August, 2018.	DATED this 10 day of August, 2018.	
23	LAXALT & NOMURA, LTD.	THE GRUNSKY LAW FIRM PC	
24	/s/ Daniel T. Hayward	/s/ Frederick H. Ebey	
25	DANIEL T. HAYWARD (SBN 5986) 9790 Gateway Drive – Suite 200	FREDERICK H. EBEY(CA BN 33802) (admitted <i>pro hac vice</i>)	
26	Reno, Nevada 89521	240 Westgate Drive	
	Telephone: (775) 322-1170 Facsimile: (775) 322-1865	Watsonville, CA 95076 Telephone: (831)722-2444	
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1	`` '	In Association With:
2	(admitted <i>pro hac vice</i>) John A. Husmann (Illinois Bar No. 6273392)	SCOTT A. GLOGOVAC
3	`	Glogovac & Pintar 427 West Plumb Lane
4	(admitted pro hac vice)	Reno, Nevada 89509
	BATES CAREY LLP 191 N. Wacker, Suite 2400	Attorneys for Defendants
5	Chicago, IL 60606	CSAA Insurance Exchange
6	Telephone: (312) 762-3100 Facsimile: (312) 762-3200	
7	Attorneys for Plaintiff	
8	Rockhill Insurance Company	
9		
10	DATED this 10 day of Avenuet 2019	
11	DATED this 10 day of August, 2018.	
12	LAW OFFICE OF LISA A. TAYLOR	
13	/s/ Lisa A. Taylor	
14	LISA A. TAYLOR 5664 N. Rainbow Blvd.	
15	Las Vegas, Nevada 89130	
16	Telephone: (702) 645-0150	
17	Attorney for Defendant, Premier Restoration and Remodel, Inc.	
18		
19	<u>ORDER</u>	
20		
21	IT IS SO ORDERED.	0
22	Howa	of DMEKiller
23	UNITED S	STATES DISTRICT JUDGE
24	DATED 11: 12: 1 CA COSTO	
25	DATED this <u>13</u> day of August, 2018.	
26		
27		

LAXALT & NOMURA. ATTORNEYS AT LAW 9790 GATEWAY DRIVE SUITE 200 RENO, NEVADA 89521

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