1		THE HONORABLE THOMAS S. ZILLY
2		
3		
4		
5		
6	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE	
7		
8	NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA., a Pennsylvania insurance company,	NO. 2:16-cv-01534 TSZ
9	remisylvana insurance company,	STIPULATED MOTION AND ORDER
10	Plaintiff, v.	EXTENDING DEADLINE TO FILE ANSWER TO FIRST AMENDED COUNTERCLAIMS
11		
12	SEATTLE SCHOOL DISTRICT NO. 1, a Washington municipal corporation,	
13 14	Defendant.	
14	National Union Fire Insurance Com	pany of Pittsburgh, PA ("National Union") and

National Union Fire Insurance Company of Pittsburgh, PA ("National Union") and Seattle School District No. 1 ("SSD"), by and through their attorneys of record, hereby submit this Stipulated Motion and Proposed Order Extending Deadline for National Union to file its Answer to SSD's First Amended Counterclaims.

I. STIPULATED MOTION

On November 20, 2017, National Union filed its First Amended Complaint for Declaratory Judgment regarding Insurance Coverage (Dkt.34), per this Court's Order of November 15, 2017 (Dkt.33). On December 11, 2017, SSD filed its Answer to First Amended Complaint and First Amended Counterclaims (Dkt.35). Pursuant to the Court Order of November 15, 2017, National Union's Answer to SSD's First Amended Counterclaims is due on

STIPULATED MOTION AND ORDER EXTENDING DEADLINE TO FILE ANSWER TO FIRST AMENDED COUNTERCLAIMS – PAGE 1 Case No. 2:16-cv-01534

16

17

18

19

20

21

22

23

24

25

GORDON REES SCULLY MANSUKHANI, LLP 701 5th Avenue, Suite 2100

Seattle, WA 98104 Telephone: (206) 695-5100 Facsimile: (206) 689-2822 January 2, 2018. However, in light of the intervening holidays, National Union is seeking a week extension, from January 2, 2018 to January 9, 2018, to file its Answer to SSD's First Amended Counterclaims.

Accordingly, the parties respectfully request that this Court extend the deadline for National Union to file its Answer to SSD's First Amended Counterclaims from January 2, 2018 to January 9, 2018.

DATED this 27th day of December, 2017.

GORDON REES SCULLY MANSUKHANI, LLP

By: <u>s/ Donald J. Verfurth</u> Donald J. Verfurth, WSBA No. 15554 Sally S. Kim, WSBA No. 35289 Attorneys for Plaintiff NATIONAL UNION FIRE INSURANCE COMPANY 701 Fifth Avenue, Suite 2100 Seattle, WA 98104 Email: <u>dverfurth@grsm.com</u> Email: <u>sallykim@grsm.com</u>

PATTERSON BUCHANAN FOBES & LEITCH, INC., P.S.

By: <u>s/ Kevin J. Kay</u> Kevin J. Kay, WSBA No. 34546 Attorneys for Defendant SEATTLE SCHOOL DISTRICT 2112 Third Avenue, Suite 500 Seattle, WA 98121 Email: <u>kjk@pattersonbuchanan.com</u>

STIPULATED MOTION AND ORDER EXTENDING DEADLINE TO FILE ANSWER TO FIRST AMENDED COUNTERCLAIMS – PAGE 2 Case No. 2:16-cv-01534

GORDON REES SCULLY MANSUKHANI, LLP

701 5th Avenue, Suite 2100 Seattle, WA 98104 Telephone: (206) 695-5100 Facsimile: (206) 689-2822

1	II. OF	RDER
2	Based on the foregoing Stipulated Motion:	
3	IT IS HEREBY ORDERED that National Union Fire Insurance Company of Pittsburgh	
4	Pa. has up to and including January 9, 2018, to answer Seattle School District No. 1's Firs	
5	Amended Counterclaims.	
6	DATED this 4th day of January, 2018.	
7		Thomas S Filly
8		
9		Thomas S. Zilly United States District Judge
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25	STIPULATED MOTION AND ORDER EXTENDING DEADLINE TO FILE ANSWER TO FIRST AMENDED COUNTERCLAIMS – PAGE 3 Case No. 2:16-cv-01534	GORDON REES SCULLY MANSUKHANI, LLP 701 5th Avenue, Suite 2100 Seattle, WA 98104 Telephone: (206) 695-5100 Facsimile: (206) 689-2822