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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 MULTIFAMILY CAPTIVE GROUP, LLC,
12 A Maryland Corporation

13 Plaintiff,

14 v.

15 ASSURANCE RISK MANAGERS, INC.,
16 A Colorado Corporation; LISA ISOM,
17 an Individual; NETWORKED INSURANCE
18 AGENTS, INC., A California Corporation;
19 and CALIFORNIA APARTMENT
20 ASSOCIATION, A California Corporation,

Defendants

Case No. 2:08-cv-00547-FCD-DAD

STIPULATION AND ORDER FOR
THIRD EXTENSION OF TIME TO
FILE RESPONSIVE PLEADING
BY DEFENDANTS ASSURANCE
RISK MANAGERS, INC. AND
LISA ISOM

Local Rule 6-144(a)

21 Plaintiff Multifamily Captive Group, LLC and Defendants Assurance Risk
22 Managers, Inc. and Lisa Isom, by and through their respective counsel hereby stipulate,
23 pursuant to Local Rule 6-144(a), that the deadline for the filing of a responsive pleading
24 by Defendant Assurance Risk Managers and Lisa Isom shall be, and hereby is extended,
25 to June 27, 2008.

26 The parties have stipulated to two prior extensions with respect to this pleading.
27 Defendants' responsive pleading is currently due on June 13, 2008. The Order requested
28 herein would bring the total extension for the filing of a responsive pleading to 46 days.

29 Plaintiff has filed an amended complaint. The parties believe an exchange of
30 documents might narrow the issues under the Amended Complaint and, to this end, have
31 been negotiating a confidentiality agreement pursuant to which they will accomplish the

1 exchange of documents. Defendants anticipate receiving these documents within the
2 requested two week extension. The requested extension will not prejudice any party to
3 the litigation, as there is currently a pending Motion to Dismiss filed by Defendant CAA
4 pending before the court and set for hearing on August 8, 2008, and this matter will not
5 be at issue until resolution of this motion.

6
7 Dated: June 13, 2008

8
9 MURPHY, PEARSON, BRADLEY
10 & FEENEY

11
12 LICHTENFELS, PANSING & MILLER,
13 P.C

14 BY: /s/ William A. Munoz

15 BY: /s/ Curtis R. Henry

16 William A. Munoz

17 Curtis R. Henry

18 Attorneys for Plaintiff

19 Attorneys for Defendants

20 MULTIFAMILY CAPTIVE GROUP

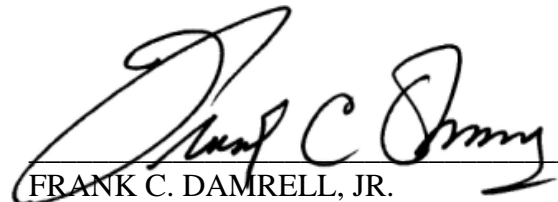
21 ASSURANCE RISK MANAGERS

22 Authorized on June 13, 2008

23 LISA ISOM

24
25 IT IS SO ORDERED

26 Dated: June 13, 2008


FRANK C. DAMRELL, JR.
UNITED STATES DISTRICT JUDGE