1 2 3 4 5 6 7	ROBERT J. ROMERO (SBN: 136539) EDWARD F. DONOHUE (SBN 112730) CRISTINA L. PIECHOCKI (SBN: 291860) HINSHAW & CULBERTSON, LLP One California Street, 18th Floor San Francisco, CA 94111 Telephone: (415) 362-6000 Facsimile: (415) 834-9070 rromero@hinshawlaw.com Attorneys for Plaintiff Kinsale Insurance Company	0)
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9	UNITED STATES DISTRICT COURT	
	FOR THE EASTERN DIS	STRICT OF CALIFORNIA
10 11	KINSALE INSURANCE COMPANY,	No. 2:14-cv-02086-GEB-KJN (TEMP)
	an Arkansas corporation,	
12 13	Plaintiff,	STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANTS TO RESPOND TO PLAINTIFF'S
14	vs.	REQUEST FOR PRODUCTION OF DOCUMENTS
15	SKY HIGH SPORTS LLC. a California	
16	SKY HIGH SPORTS LLC, a California) and Nevada Limited Liability Company,) SKY HIGH SPORTS CONCORD LLC,)	
17	a California and Nevada Limited) Liability Company, SKY HIGH) SPORTS NASHVILLE LLC, a Nevada)	
18	and Tennessee Limited Liability (Company, SKY HIGH SPORTS)	
19	ONTARIO LLC, a California and Nevada Limited Liability Company,	
20	SKY HIGH SPORTS OPPORTUNITIES) LLC, a California and Nevada Limited	
21	Liability Company, SKY HIGH) SPORTS ORANGE COUNTY LLC, a)	
22	California and Nevada Limited liability (Company, SKY HIGH SPORTS) SACRAMENTO LLC, a California and (Company)	
23	SACRAMENTO LLC, a California and) Nevada Limited Liability Company,) SKY HIGH SPORTS SANTA CLARA)	
24	LLC, a California and Nevada Limited)	
25	Liability Company, SKY HIGH) SPORTS SEATTLE LLC, a Nevada and)	
26	Washington Limited Liability Company, and DOES 1-20 inclusive,	
27	Defendants.	
28		

This Stipulation is made by and between Plaintiff KINSALE INSURANCE
COMPANY ("Kinsale") and Defendants SKY HIGH SPORTS LLC, SKY HIGH
SPORTS CONCORD LLC, SKY HIGH SPORTS NASHVILLE LLC, SKY HIGH
SPORTS ONTARIO LLC, SKY HIGH SPORTS OPPORTUNITIES LLC, SKY
HIGH SPORTS ORANGE COUNTY LLC, SKY HIGH SPORTS SACRAMENTO
LLC, SKY HIGH SPORTS SANTA CLARA LLC, and SKY HIGH SPORTS
SEATTLE LLC (collectively, "Sky High"), by and through their respective counsel of
record.

WHEREAS on or about September 9, 2014, Kinsale filed its Complaint against Sky High for breach of contract and declaratory relief (the "Complaint");

WHEREAS on or about April 13, 2015, Kinsale served each named defendant with Plaintiff's Request for Production of Documents, Set One ("Requests");

WHEREAS on or about June 26, 2015, Kinsale filed a motion to compel Sky High's responses to the Requests;

WHEREAS on or about August 8, 2015, Magistrate Judge Dale A. Drozd granted Kinsale's motion to compel and ordered that Sky High produce responses to the Requests within 60 days of the Order;

WHEREAS on or about September 1, 2015 and September 2, 2015, Kinsale conducted an premium audit of Sky High;

WHEREAS Kinsale and Sky High are currently meeting and conferring regarding the results of the premium audit;

WHEREAS Kinsale is currently analyzing the results of the premium audit, and making a determination as to what further responses IF ANY, are required;

WHEREAS Kinsale has agreed to provide Sky High additional time, specifically until November 30, 2015, in which to comply with the Court's Order to produce responses to the Requests.

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1	NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED between		
2	Kinsale and Sky High, by and through their counsel of record that Kinsale will		
3	provide Sky High with an extension of time until November 30, 2015 to provide		
4	responses to the Requests.		
5			
6	IT IS SO STIPULATED.		
7			
8	Date: November 2, 2015	HINSHAW & CULBERTSON LLP	
9			
10		/s/ Cristina L. Piechocki ROBERT J. ROMERO	
11		EDWARD F. DONOHUE CRISTINA L. PIECHOCKI	
12		Attorneys for Plaintiff KINSALE INSURANCE COMPANY	
13			
14	Date: October 30, 2015	SISCO & NARAMORE	
15		/ / K	
16 17		/s/ Kenneth D. Sisco KENNETH D. SISCO	
18		Attorneys for Defendants SKY HIGH SPORTS LLC, SKY HIGH SPORTS CONCORD LLC, SKY HIGH	
19		SPORTS NASHVILLE LLC, SKY HIGH SPORTS ONTARIO LLC, SKY	
20		HIGH SPORTS OPPORTUNITIES LLC, SKY HIGH SPORTS ORANGE	
21		COUNTY LLC, SKY HIGH SPORTS SACRAMENTO LLC, SKY HIGH	
22		SPORTS SANTA CLÁRA LLC, and SKY HIGH SPORTS SEATTLE LLC	
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28	///		

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