

19TH JUDICIAL DISTRICT COURT FOR THE PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

NO. 651,069

SECTION 22

JAMES J. DONELON, COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA, IN HIS CAPACITY AS REHABILITATOR OF LOUISIANA HEALTH COOPERATIVE, INC.

VERSUS

CGI TECHNOLOGIES AND SOLUTIONS, INC., GROUP RESOURCES INCORPORATED, BEAM PARTNERS, LLC, MILLIMAN, INC., BUCK CONSULTANTS, LLC. WARNER L. THOMAS, IV, WILLIAM A. OLIVER, SCOTT POSECAI, PAT QUINLAN, PETER NOVEMBER, MICHAEL HULEFEED, ALLIED WORLD SPECIALTY INSURANCE COMPANY a/k/a DARWIN NATIONAL ASSURANCE COMPANY, ATLANTIC SPECIALTY INSURANCE COMPANY, EVANSTON INSURANCE COMPANY, RSUI INDEMNITY COMPANY AND ZURICH AMERICAN INSURANCE COMPANY

FILED: _____ DEPUTY CLERK

CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S SECOND SUPPLEMENTAL, AMENDING AND RESTATED PETITION FOR DAMAGES

Defendant Allied World Specialty Insurance Company (f/k/a Darwin National Assurance Company) ("Allied"), through undersigned counsel, hereby moves for an extension of time within which to respond to Plaintiff's Second Supplemental, Amending and Restated Petition for Damages filed in the above-referenced matter based on the following grounds:

1.

Allied was served with the Plaintiff's Second Supplemental, Amending and Restated Petition for Damages on November 3, 2017, making a responsive pleading due on November 17, 2017.

2.

Allied was named for the first time as a defendant in Plaintiff's Second Supplemental, Amending and Restated Petition for Damages. Undersigned counsel was recently retained to represent Allied in this matter, and needs additional time to make a proper investigation and prepare responsive pleadings in this matter.

3.

Allied requests that this Court grant it a thirty (30) day extension of time, until and including December 18, 2017, within which to file responsive pleadings. This extension will not unduly delay the hearing or determination of this case.

4.

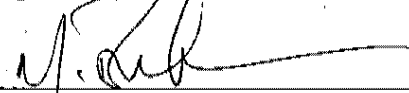
This motion is Allied's first motion for an extension of time within which to respond to the pleadings in this matter.

5.

Counsel for Plaintiff has been contacted and has no objection to this extension.

WHEREFORE, Allied respectfully requests that this consent motion be granted and that Allied be allowed an extension of time up to and including December 18, 2017 within which to respond to Plaintiff's Second Supplemental, Amending and Restated Petition for Damages.

Respectfully submitted,

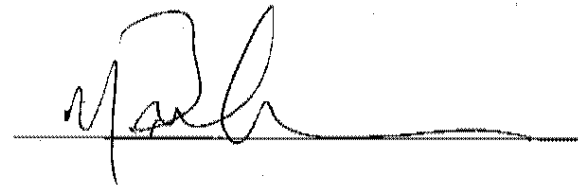


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*Attorneys for Allied World Specialty
Insurance Company*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon all counsel of record by facsimile, electronic mail, and/or by placing same in the United States mail, postage prepaid, this 14th day of November, 2017.



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FILED: _____

DEPUTY CLERK

ORDER

Considering the foregoing Consent Motion for Extension of Time to Respond to Plaintiff's Second Supplemental, Amending and Restated Petition for Damages;

IT IS ORDERED that that the motion is **GRANTED**, and that Allied World Specialty Insurance Company (f/k/a Darwin National Insurance Company) is hereby granted an extension of time through and including December 18, 2017 within which to respond to Plaintiff's Second Supplemental, Amending and Restated Petition for Damages.

Baton Rouge, Louisiana this _____ day of _____, 2017.

JUDGE TIMOTHY E. KELLEY

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FILED: _____

DEPUTY CLERK

ALLIED WORLD SPECIALTY INSURANCE COMPANY'S REQUEST FOR NOTICE

Allied World Specialty Insurance Company (f/k/a Darwin National Assurance Company) ("Allied"), pursuant to Louisiana Code of Civil Procedure article 1572, moves this Court for written notice at least ten (10) days in advance of the date fixed for a trial or hearing of any exception, motion, rule, or trial on the merits in the above-captioned proceeding and, pursuant to Louisiana Code of Civil Procedure articles 1913 and 1914, requests immediate notice of all interlocutory and final orders and judgments on any exceptions, motions, rules, or the trial on the merits in the above-captioned proceeding.

Respectfully submitted,



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*Attorneys for Allied World Specialty
Insurance Company*

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