

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA,)
EX REL. BRANCH CONSULTANTS, L.L.C.,)
)
Plaintiff,)

v.)

ALLSTATE INSURANCE COMPANY,)
LIBERTY MUTUAL FIRE INSURANCE)
COMPANY, FIDELITY NATIONAL)
INSURANCE COMPANY, FIDELITY)
NATIONAL PROPERTY AND CASUALTY)
INSURANCE COMPANY, AMERICAN)
NATIONAL PROPERTY & CASUALTY)
COMPANY, AMERICAN RELIABLE)
INSURANCE CO. OF SCOTTSDALE,)
STANDARD FIRE INSURANCE COMPANY,)
ALLIED AMERICAN ADJUSTING COMPANY)
L.L.C., SIMSOL INSURANCE SERVICES,)
INC., COLONIAL CLAIMS CORPORATION,)
AND JOHN DOES 1-99,)
Defendants.)

Case No. 2:06-cv-4091

JURY TRIAL DEMANDED

**BRANCH'S RESPONSE TO DEFENDANTS' MOTION
FOR EXTENSION OF TIME TO PLEAD**

Plaintiff-Relator Branch Consultants, L.L.C.'s ("Branch") First Amended Complaint was filed on June 22, 2007. Branch does not object to extending Defendants' time to answer Branch's three-year-old complaint until November 23, 2009. Branch does object, however, to allowing further delay of this action if Defendants intend *not* to file answers on November 23,

2009 but, instead, intend to make other filings seeking yet another stay of discovery in this three-year-old lawsuit. Furthermore, while Branch intends to file a second amended complaint it has no intention at present of amending any of its allegations against those Defendants seeking the present extension.

In sum, Branch does not oppose the requested extension but respectfully requests that the Court provide that discovery will not be delayed as a result of it.

DATED: November 2, 2009

Respectfully submitted:

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CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2009, a copy of the above and foregoing Branch's Response to Defendant's Motion for Extension of Time has been served upon all counsel of record in this matter by placing the same in the U.S. Mail, first class postage prepaid and properly addressed, by facsimile and/or by electronic mail using the CM/ECF.

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