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9 CERTAIN UNDERWRITERS AT LLOYD'S OF LONDON,
10 100% SYNDICATE 2020

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 TRAVELERS PROPERTY CASUALTY
14 COMPANY OF AMERICA, a Connecticut
15 corporation,,
16

17 Plaintiff,

18 v.

19 OLD REPUBLIC INSURANCE
20 COMPANY, a Pennsylvania corporation;
21 EVEREST INDEMNITY INSURANCE
22 COMPANY, a Delaware corporation;
23 INTERSTATE FIRE & CASUALTY
24 COMPANY, an Illinois corporation;
25 FINANCIAL PACIFIC INSURANCE
26 COMPANY, a California corporation;
27 ARCH SPECIALTY INSURANCE
28 COMPANY, a Nebraska corporation/
NAVIGATORS SPECIALTY
INSURANCE COMPANY, a New York
corporation, CLARENDON NATIONAL
INSURANCE COMPANY, a New Jersey
corporation; ACE AMERICAN
INSURANCE COMPANY fka ALLIED
INSURANCE COMPANY, a Pennsylvania
corporation; NATIONAL UNION FIRE
INSURANCE COMPANY OF
PITTSBURGH, PA, a Pennsylvania
corporation; ASPEN SPECIALTY
INSURANCE COMPANY, a North Dakota
corporation; FIRST SPECIALTY
INSURANCE COMPANY, a Missouri
corporation; IRONSHORE SPECIALTY
INSURANCE COMPANY, an Arizona
corporation; AMERICAN SAFETY
INDEMNITY COMPANY, an Oklahoma

Case No. 1:13-cv-00576-LJO-BAM

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND
TO FIRST AMENDED COMPLAINT**

1 corporation; LEXINGTON INSURANCE
2 COMPANY, a Delaware corporation;
3 PROBUILDERS SPECIALTY
4 INSURANCE COMPANY, PRG, a
5 Washington, D.C. corporation; SECURITY
6 AMERICA RICK RETENTION GROUP, a
7 Vermont corporation/ ILLINOIS UNION
8 INSURANCE COMPANY, an Illinois
9 corporation; ZURICH NORTH
10 AMERICAN INSURANCE COMPANY, a
11 New York corporation; LIBERTY
12 MUTUAL INSURANCE COMPANY, a
13 Massachusetts corporation; NORTHERN
14 INSURANCE COMPANY OF NEW
15 YORK, a New York corporation,
16 CHARTIS SPECIALTY INSURANCE
17 COMPANY fka AMERICAN
18 INTERNATIONAL SPECIALTY LINES
19 INSURANCE COMPANY, an Illinois
20 corporation; NAVIGATORS INSURANCE
21 COMPANY, a New York corporation;
22 TRUCK INSURANCE EXCHANGE, a
23 California corporation; CERTAIN
24 UNDERWRITERS AT LLOYD'S OF
25 LONDON, a Kentucky corporation;
26 PRAETORIAN INSURANCE
27 COMPANY, a Pennsylvania corporation,
28 and DOES 1 through 10, inclusive,

Defendants

This Stipulation is entered into by and between Plaintiff, TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA ("TRAVELERS") and Defendant, CERTAIN UNDERWRITERS AT LLOYD'S OF LONDON, 100% SYNDICATE 2020 ("UNDERWRITERS").

RECITALS

1. On or about April 19, 2013, TRAVELERS filed an action entitled *Travelers Property Casualty Company of America v. Old Republic Insurance Company, et al.* in the Eastern District of California, Case No. 1:13-CV-00576-LJO-BAM.
2. On or about August 21, 2013, TRAVELERS filed a first-amended complaint (the "FAC").
3. By stipulation filed October 23, 2013, and entered by the Court on October 24, 2013, TRAVELERS substituted one of the defendants to the FAC, namely,

1 UNDERWRITERS, instead and in place of Catlin Specialty Insurance Company.

2 4. On or about November 8, 2013, TRAVELERS served UNDERWRITERS
3 with a summons and the FAC.

4 5. Under Federal R. of Civ. Proc., Rule 12(a)(1), UNDERWRITERS' response
5 was due on December 2, 2013.

6 6. UNDERWRITERS and TRAVELERS previously stipulated to a brief
7 extension of time for UNDERWRITERS to provide a responsive pleading by December
8 20, 2013

9 7. UNDERWRITERS and TRAVELERS are discussing whether TRAVELERS
10 will dismiss UNDERWRITERS from this lawsuit.

11 8. UNDERWRITERS and TRAVELERS believe that a further three (3) week
12 extension will provide time for TRAVELERS to attempt to resolve this issue.

13 **IT IS HEREBY STIPULATED AND AGREED:**

14 UNDERWRITERS are awarded an additional three week extension of time to file a
15 responsive pleading in this action. UNDERWRITERS' response to the FAC is now due on
16 January 10, 2014.

17 This stipulation shall not constitute an appearance by UNDERWRITERS.
18 UNDERWRITERS do not waive the right to challenge the Court's jurisdiction over this
19 matter.

20
21 DATED: December 6, 2013

THE AGUILERA LAW GROUP, APLC

22
23 *Angela N. Martin*

24 By: _____

KARI MYRON
ANGELA N. MARTIN

25 Attorneys for Plaintiff
26 TRAVELERS PROPERTY CASUALTY
COMPANY OF AMERICA

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DATED: December 6, 2013

SELMAN BREITMAN LLP

Diana L. Winfrey

By: _____

DIANA L. WINFREY

Attorneys for Defendant
CERTAIN UNDERWRITERS AT LLOYD'S OF
LONDON 100% SYNDICATE 2020

ORDER

The Court having reviewed the stipulation between Plaintiffs TRAVELERS and Defendant UNDERWRITERS further extending the time for UNDERWRITERS to respond to the First Amended Complaint, the Court grants the stipulation and orders that UNDERWRITERS shall have until January 10, 2014 to respond to the First Amended Complaint.

IT IS SO ORDERED.

Dated: December 20, 2013

/s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE