

REED SMITH LLP
A limited liability partnership formed in the State of Delaware

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 CALIFORNIA EARTHQUAKE AUTHORITY

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 METROPOLITAN WEST SECURITIES, LLC
 and WELLS FARGO BANK, N.A., successor
 14 by merger to WACHOVIA BANK, N.A.

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 16 UNITED STATES DISTRICT COURT
 17 EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

19 CALIFORNIA EARTHQUAKE AUTHORITY,
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 Plaintiff,
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 vs.
 22 METROPOLITAN WEST SECURITIES, LLC;
 23 WACHOVIA BANK, N.A.; and DOES 1 through
 24 25,
 Defendants.

No.: 2:10-CV-00291 MCE (GGH)
**JOINT REQUEST FOR CONTINUANCE
 OF HEARING ON PLAINTIFF'S
 MOTION TO COMPEL**

Date action removed: February 4, 2010
 Trial date: May 13, 2013

1 WHEREAS Plaintiff California Earthquake Authority (“Plaintiff”) filed a motion on
2 February 17, 2012 to compel responses to document requests from Defendants Metropolitan West
3 Securities, LLC and Wells Fargo Bank, N.A., successor by merger to Wachovia Bank N.A.
4 (“Defendants”), which is presently set for hearing on April 12, 2012 before the Honorable Gregory
5 G. Hollows;

6 WHEREAS the Parties are continuing to meet and confer and prepare the joint statement
7 required under Civil Local Rule 251;

8 WHEREAS counsel for Defendants, Christopher Foster, has a family emergency that will
9 significantly interfere with the preparation of the joint statement;

10 WHEREAS Plaintiff has agreed to a brief continuance of the hearing date in order to
11 accommodate Mr. Foster’s family obligation;

12 NOW, THEREFORE, IT IS HEREBY STIPULATED by and among Plaintiff California
13 Earthquake Authority and Defendants Metropolitan West Securities LLC and Wells Fargo Bank,
14 N.A., successor by merger to Wachovia Bank, N.A., through the undersigned counsel, to jointly
15 request a continuance of the hearing on Plaintiff’s Motion to Compel [Doc. No. 41] from April 12,
16 2012 to April 26, 2012.

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IT IS SO STIPULATED:

DATED: March 22, 2012

REED SMITH LLP

By /s/ Christopher C. Foster
David C. Powell
Jesse L. Miller
Christopher C. Foster
Attorneys for Defendants Metropolitan West
Securities, LLC and Wells Fargo Bank, N.A.,
successor by merger to Wachovia Bank, N.A.

DATED: March 22, 2012

STRUMWASSER & WOOCHEER LLP

By /s/ Patricia T. Pei
Michael J. Strumwasser
Fredric D. Woocher
Patricia T. Pei
Attorneys for Plaintiff California Earthquake
Authority

IT IS SO ORDERED:

Dated: March 23 , 2012

 /s/ Gregory G. Hollows

The Honorable Gregory G. Hollows.
UNITED STATES MAGISTRATE JUDGE