

1 MICHAEL J. STRUMWASSER (SBN 58413)
FREDRIC D. WOOCHEER (SBN 96689)
2 PATRICIA T. PEI (SBN 274957)
STRUMWASSER & WOOCHEER LLP
3 10940 Wilshire Boulevard, Suite 2000
Los Angeles, California 90024
4 Tel.: (310) 576-1233 Fax: (310) 319-0156
E-mail: mstrumwasser@strumwooch.com
5 fwoocher@strumwooch.com
ppei@strumwooch.com
6

7 Attorneys for Plaintiff
California Earthquake Authority

8
9 David C. Powell (SBN 129781)
Email: dpowell@reedsmith.com
10 Jesse L. Miller (SBN 183229)
Email: jessemiller@reedsmith.com
11 Christopher C. Foster (SBN 253839)
Email: CFoster@reedsmith.com
12 REED SMITH LLP
101 Second Street, Suite 1800
13 San Francisco, CA 94105-3659
Telephone: +1 415 543 8700
14 Facsimile: +1 415 391 8269

15 Attorneys for Defendants
Metropolitan West Securities, LLC and Wells
16 Fargo Bank, N.A., successor by merger to
Wachovia Bank, N.A.
17

18 UNITED STATES DISTRICT COURT

19 EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

20 CALIFORNIA EARTHQUAKE AUTHORITY,

21 Plaintiff,

22 vs.

23 METROPOLITAN WEST SECURITIES, LLC;
WACHOVIA BANK, N.A.; and DOES 1 through
24 25,

25 Defendants.

No.: 2:10-CV-00291 MCE (GGH)

**STIPULATION AND ORDER
CONTINUING HEARING ON
PLAINTIFF’S MOTION TO QUASH**

Date action removed: February 4, 2010
Trial date: October 7, 2013

1 WHEREAS, Defendant Metropolitan West Securities, LLC (“Metropolitan West”) issued a
2 subpoena to Pricewaterhouse Coopers on June 6, 2012;

3 WHEREAS, Plaintiff California Earthquake Authority noticed a motion to quash that
4 subpoena on June 21, 2012, and set the hearing on July 19, 2012;

5 WHEREAS, the parties have been engaged in extensive meet and confer on other discovery
6 issues;

7 WHEREAS, the parties have a deposition scheduled for the day prior to the July 19th hearing
8 in Los Angeles;

9 WHEREAS, at Metropolitan West’s request, and for the convenience of the parties, the parties
10 desire to continue the hearing to July 26, 2012;

11 WHEREAS, the parties have agreed on a schedule for the opposition and reply deadlines on
12 in the event of such a continuance;

13 NOW, THEREFORE, IT IS HEREBY STIPULATED by and among Plaintiff California
14 Earthquake Authority and Defendants Metropolitan West Securities LLC and Wachovia Bank,
15 N.A., through the undersigned counsel, as follows:

- 16 1. The July 19, 2012 hearing on the motion to quash shall be continued to July 26, 2012
17 at 10:00 a.m.
- 18 2. Defendants shall file the opposition to Plaintiff’s motion on or before July 10, 2012.
- 19 3. Plaintiff shall file its reply in support of its motion to quash on or before July 19,
20 2012.

21
22
23
24 ///

25 ///

26 ///

27 ///

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IT IS SO STIPULATED:

DATED: June 29, 2012 REED SMITH LLP

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

DATED: June 29, 2012 STRUMWASSER & WOOCHEER LLP

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

IT IS SO ORDERED:

Dated: July 2, 2012 /s/ Gregory G. Hollows
The Honorable Gregory G. Hollows
UNITED STATES MAGISTRATE JUDGE