1 2 3 4 5 6 7 8	DOWNEY BRAND LLP ROBERT P. SORAN (Bar No. 169577) ELIZABETH B. STALLARD (Bar No. 221445) OLIVIA M. WRIGHT (Bar No. 240200) 621 Capitol Mall, 18th Floor Sacramento, CA 95814-4731 Telephone: (916) 444-1000 Facsimile: (916) 444-2100 rsoran@downeybrand.com estallard@downeybrand.com owright@downeybrand.com Attorneys for Plaintiff and Counterdefendant BEL AIR MARKET, a California Corporation		
9	UNITED STATES DISTRICT COURT		
10	EASTERN DISTRICT OF CALIFORNIA		
11			
12	BEL AIR MART, a California corporation	Case No. 2:10-CV-02392 MCE-EFB	
13	and WONG FAMILY INVESTORS, L.P.,	STIPULATION TO EXTEND TIME TO	
14	Plaintiffs,	<b>RESPOND TO THE COUNTER AND CROSS-CLAIM OF THE ESTATE OF</b>	
15		RONALD G. ARMSTRONG, DECEASED; ORDER	
16	ARNOLD CLEANERS, INC.; et al.,		
17	Defendants.		
18			
19	AND RELATED CROSS-ACTIONS		
20	AND RELATED CROSS-ACTIONS		
20	TO THE COURT. ALL PARTIES. A	AND THEIR COUNSEL OF RECORD HEREIN:	
22		dant Century Indemnity Company, as successor to	
23		urance Company of North America, as alleged	
24	insurer of The Estate of Ronald G. Armstrong, Deceased, pursuant to California Probate Code		
25		el of record Farheena A. Habib of Bassi Edlin Huie &	
26	Blum LLP, and Plaintiffs Bel Air Mart, a California corporation, by and through its counsel of		
27	record Robert P. Soran of Downey Brand, and Wong Family Investors, L.P., by and through its		
28	counsel of record John C. Lassner of the Law Office of John C. Lassner, and Defendant Robert		
	1290091.1 STIPLIL ATION TO EXTEND TIME TO RESPOND	1 TO COUNTER AND CROSS-CLAIMS; [PROPOSED] ORDER	
	5111 OLATION TO EATEND TIME TO KESPOND	TO COUTTER AND CROSS-CLAIMS, [I ROFOSED] ORDER	

1 Gern Nagler, individually and as Trustee of the John W. Burns Testamentary Trust ("Nagler"), by 2 and through his counsel of record Eric Garner of Wagner, Kirkman, Blaine, Klomparens & 3 Youmans LLP, stipulate and agree as follows: 4 The deadline for Plaintiffs and Nagler to respond to the Counter and Cross-Claims filed 5 by Century Indemnity Company, as successor to CCI Insurance Company, as successor to 6 Insurance Company of North America, as alleged insurer of The Estate of Ronald G. Armstrong, 7 Deceased, pursuant to California Probate Code section 550 *et seq.*, shall be extended for 28 days 8 from November 30, 2012, up to and including December 28, 2012. No prior extensions of time to 9 respond to this pleading have been granted. 10 Good cause exists for the requested extension. Several parties to this action, including but 11 not limited to the parties to this stipulation, are presently engaged in settlement discussions, have 12 participated in a full day of mediation before Robert Kaplan of Judicate West, and have agreed to 13 continue the mediation to a mutually acceptable date in the future. Based on the status of the 14 parties settlement discussions and mediation, as well as other factors, the parties are meeting and 15 conferring about the possibility of filing a joint motion seeking a further brief stay of the 16 litigation. The requested extension would allow the parties to conserve their limited resources 17 while these settlement discussions and mediation are ongoing. 18 DATED: November 27, 2012 DOWNEY BRAND LLP 19 20 By: /s/ Robert P. Soran ROBERT P. SORAN 21 Attorneys for Plaintiff and Counterdefendant BEL AIR MART, a California corporation 22 DATED: November 27, 2012 LAW OFFICE OF JOHN C. LASSNER 23 24 By: /s/ John C. Lassner [as authorized on 11/26/12] 25 JOHN C. LASSNER Attorneys for Plaintiff and Counterdefendant 26 WONG FAMILY INVESTORS, L.P. 27 28 2 1290091.1

1		VAGNER, KIRKMAN, BLAINE, KLOMPARENS	
2	8	z YOUMANS LLP	
3	ar an	By: <u>/s/ Eric Garner [as authorized on 11/27/12]</u>	
4		ERIC GARNER	
5		Attorneys for Defendants and Counterclaimants R. GERN NAGLER as Trustee of the John W.	
6 7		Burns Testamentary Trust, and ROBERT GERN NAGLER	
7 8	DATED: November 27, 2012 B	ASSI EDLIN HUIE & BLUM LLP	
9			
10	В	by: /s/ Farheena Habib [as authorized on 11/27/12]	
11		FARHEENA HABIB Attorneys for CENTURY INDEMNITY COMPANY, on behalf of Defendant and	
12		Counterclaimant THE ESTATE OF RONALD G. ARMSTRONG, DECEASED	
13			
14		ORDER	
15	Pursuant to the joint stipulation of the parties, and good cause appearing, the request to		
16	extend the deadline for Plaintiffs and	Nagler to respond to the Counter and Cross-Claims filed by	
17	Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance		
18	Company of North America, as aneged insurer of the Estate of Konaid G. Affistiong, Deceased,		
19	pursuant to Camorina Probate Code section 550 et seq., is OKANTED. The deadline for		
20	Plaintiffs and Nagler to respond to the	e Counter and Cross-Claims is hereby extended for 28 days	
21 22	from November 30, 2012, up to and i	ncluding December 28, 2012.	
22	Dated: November 30, 2012	11 062	
23		Molan Il i.	
25		MORRISON C. ENGLAND, JR UNITED STATES DISTRICT JUDGE	
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