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8	DEL MICHARIET, a Camorna Corporatio	
9	UNITED STATES DISTRICT COURT	
10	EASTERN DIST	RICT OF CALIFORNIA
11		
12	BEL AIR MART, a California corporation and WONG FAMILY INVESTORS, L.P.,	Case No. 2:10-CV-02392 MCE-EFB
13	Plaintiffs,	STIPULATION TO EXTEND TIME TO
14	,	RESPOND TO THE COUNTER AND CROSS-CLAIM OF THE ESTATE OF
15	V.	RONALD G. ARMSTRONG, DECEASED; ORDER
16	ARNOLD CLEANERS, INC.; et al.,	
17	Defendants.	
18		
19	AND RELATED CROSS-ACTIONS	
20		
21	TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD HEREIN:	
22	Pursuant to Local Rule 144(a), Defendant Century Indemnity Company, as successor to	
23	CCI Insurance Company, as successor to Insurance Company of North America, as alleged	
24	insurer of The Estate of Ronald G. Armstrong, Deceased, pursuant to California Probate Code	
25	section 550 et seq., by and through its counsel of record Farheena A. Habib of Bassi Edlin Huie &	
26	Blum LLP, and Plaintiffs Bel Air Mart, a Cal	ifornia 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	
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	STIPULATION TO EXTEND TIME TO RESPOND T	TO COUNTER AND CROSS-CLAIMS; [PROPOSED] ORDER

1	Gern Nagler, individually and as Trustee of the John W. Burns Testamentary Trust ("Nagler"), b	
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	
21	ROBERT P. SORAN Attorneys for Plaintiff and Counterdefendant	
22	BEL AIR MART, a California corporation	
23	DATED: November 27, 2012 LAW OFFICE OF JOHN C. LASSNER	
24		
25	By: /s/ John C. Lassner [as authorized on 11/26/12] JOHN C. LASSNER	
26	Attorneys for Plaintiff and Counterdefendant	
27	WONG FAMILY INVESTORS, L.P.	
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1 2	DATED: November 27, 2012 WAGNER, KIRKMAN, BLAINE, KLOMPARENS & YOUMANS LLP	
3		
4	By: /s/ Eric Garner [as authorized on 11/27/12]_	
5	ERIC GARNER Attorneys for Defendants and Counterclaimants	
6	R. GERN NAGLER as Trustee of the John W. Burns Testamentary Trust, and	
7	ROBERT GERN NAGLER	
8	DATED: November 27, 2012 BASSI EDLIN HUIE & BLUM LLP	
9		
10	By: /s/ Farheena Habib [as authorized on 11/27/12] FARHEENA HABIB	
11	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 alleged insurer of The Estate of Ronald G. Armstrong, Deceased,	
19	pursuant to California Probate Code section 550 et seq., is GRANTED. The deadline for	
20	Plaintiffs and Nagler to respond to the Counter and Cross-Claims is hereby extended for 28 days	
21	from November 30, 2012, up to and including December 28, 2012.	
22		
23	Dated: December 4, 2012	
2425	MORRISON C. ENGLAND, JR UNITED STATES DISTRICT JUDGE	
26	UNITED STATES DISTRICT JUDGE	
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