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7	Attorneys for Plaintiff and Counterdefendant			
8	BEL AIR MARKET, a California Corporation			
9	UNITED STATES DISTRICT COURT			
10	EASTERN DISTRICT 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, SECOND STIPULATION TO EXTEND TIME TO RESPOND TO THE COUNTER			
14	v. AND CROSS-CLAIM OF THE ESTATE O RONALD G. ARMSTRONG, DECEASED) F		
15	ARNOLD CLEANERS, INC.; et al.,	,		
16	Defendants.			
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 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			
	1294451.1 1			
	SECOND STIPULATION TO EXTEND TIME TO RESPOND TO COUNTER AND CROSS-CLAIMS; [PROPOSED] ORDER			

Gern Nagler, individually and as Trustee of the John W. Burns Testamentary Trust ("Nagler"), by
 and through his counsel of record Eric Garner of Wagner, Kirkman, Blaine, Klomparens &
 Youmans LLP, stipulate and agree as follows:

4	The deadline for Plaintiffs to res	The deadline for Plaintiffs to respond to the Counter and Cross-Claims filed by Century		
5	Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance			
6	Company of North America, as alleged insurer of The Estate of Ronald G. Armstrong, Deceased			
7	pursuant to California Probate Code section 550 et seq., shall be extended for 28 days from			
8	December 28, 2012, up to and including January 25, 2013. The parties hereto previously			
9	stipulated to one prior extension from November 30, 2012 to December 28, 2012. Good cause			
10	exists for the requested extension. Several parties to this action, including but not limited to the			
11	parties to this stipulation, are presently engaged in settlement discussions, have participated in a			
12	full day of mediation before Robert Kaplan of Judicate West, and have agreed to continue the			
13	mediation to a mutually acceptable date in the future. Based on the status of the parties			
14	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	B DATED: December 21, 2012 DO	WNEY 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: December 21, 2012 LA	W OFFICE OF JOHN C. LASSNER		
24				
25	; By:	/s/ John C. Lassner [as authorized on 12/20/12] JOHN C. LASSNER		
26	5	Attorneys for Plaintiff and Counterdefendant WONG FAMILY INVESTORS, L.P.		
27	7			
28	3			
	1294451.1	2 RESPOND TO COUNTER AND CROSS-CLAIMS; [PROPOSED] ORDER		

1	DATED: December 21, 2012 BASSI EDLIN HUIE & BLUM LLP			
2				
3 4	By: <u>/s/ Farheena Habib [as authorized on 12/20/12]</u> FARHEENA HABIB Attorneys for CENTURY INDEMNITY			
5	COMPĂNY, on behalf of Defendant and Counterclaimant THE ESTATE OF RONALD G. ARMSTRONG, DECEASED			
6 7				
7 8	ORDER			
8 9	Pursuant to the joint stipulation of the parties, and good cause appearing, the request to			
10	 extend the deadline for Plaintiffs to respond to the Counter and Cross-Claims filed by Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America, as alleged insurer of The Estate of Ronald G. Armstrong, Deceased, pursuant to California Probate Code section 550 <i>et seq.</i>, is GRANTED. The deadline for 			
10				
12				
13				
14	Plaintiffs to respond to the Counter and Cross-Claims is hereby extended for 28 days from December 28, 2012, up to and including January 25, 2013.			
15				
16 17	Dated: December 27, 2012 Malan Above.			
18	MORRISON C. ENGLAND, JR UNITED STATES DISTRICT JUDGE			
19 20				
20 21				
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	1294451.1 3			
24 25 26 27	1294451.1 3 Second Stipulation to Extend Time to Respond to Counter and Cross-Claims; [Proposed] Ori			