1	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		
2			
3			
4	Sacramento, CA 95814-4731 Telephone: (916) 444-1000		
5	Facsimile: (916) 444-2100 rsoran@downeybrand.com		
6	estallard@downeybrand.com owright@downeybrand.com		
7	Attorneys for Plaintiff and Counterdefendant		
8	BEL AİR MARKET, a California Corporation		
9	UNITED STATES DISTRICT COURT		
10	EASTERN DISTRICT OF CALIFORNIA		
11	BEL AIR MART, a California corporation	Case No. 2:10-CV-02392 MCE-EFB	
12	and WONG FAMILY INVESTORS, L.P.,	THIRD STIPULATION TO EXTEND TIME	
13	Plaintiffs,	TO RESPOND TO THE COUNTER AND CROSS-CLAIM OF THE ESTATE OF	
14	v.	RONALD G. ARMSTRONG, DECEASED; ORDER	
15	ARNOLD CLEANERS, INC.; et al.,	ORDER	
16	Defendants.		
17			
18	AND RELATED CROSS-ACTIONS		
19	AND RELATED CROSS-ACTIONS		
20	TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD HEREIN:		
21	Pursuant to Local Rule 144(a), Defendant Century Indemnity Company, as successor to		
22	CCI Insurance Company, as successor to Insurance Company of North America, as alleged		
23	insurer of The Estate of Ronald G. Armstrong, Deceased, pursuant to California Probate Code		
24	section 550 et seq., by and through its counsel of record Farheena A. Habib of Bassi Edlin Huie &		
25	Blum LLP, and Plaintiffs Bel Air Mart, a Ca	lifornia corporation, by and through its counsel of	
26	record Robert P. Soran of Downey Brand, an	d Wong Family Investors, L.P., by and through its	
27	counsel of record John C. Lassner of the Law Office of John C. Lassner, stipulate and agree as		
28	follows:		
	1297891.1	1	
	THIRD STIPULATION TO EXTEND TIME TO RESPO	ND TO COUNTER AND CROSS-CLAIMS; [PROPOSED] ORDER	

1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	

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 et seq., ("Century"), shall be extended from
January 25, 2013, up to and including April 30, 2013. The extension provided for by this
Stipulation may be terminated by any party to this Stipulation by service of written notice of
termination served by hand delivery, email, or facsimile. If the extension provided for by this
Stipulation is so terminated, the deadline for Plaintiffs to respond to the Counter and Cross-
Claims filed by Century shall be 20 days after the date of delivery of the notice of termination.
The parties hereto previously stipulated to two prior extensions from November 30, 2012 to
December 28, 2012, and from December 28, 2012 to January 25, 2013. Good cause exists for the
requested extension. Several parties to this action, including but not limited to the parties to this
stipulation, are engaged in settlement discussions, have participated in a full day of mediation
before Robert Kaplan of Judicate West, and have agreed to continue the mediation to a mutually
acceptable date in the future. The parties are hopeful that the continued mediation will take place
in late March or April 2013, and are working to coordinate and schedule this continued
mediation. Based on the status of the parties settlement discussions and mediation, as well as
other factors, the parties are meeting and conferring about the possibility of filing a joint motion
seeking a further brief stay of the litigation. The requested extension would allow the parties to
conserve their limited resources while these settlement discussions and mediation are ongoing.

DATED: January 18, 2013

22

23

24

25

26

27

28

By: /s/ Robert P. Soran ROBE

DOWNEY BRAND LLP

ROBERT P. SORAN
Attorneys for Plaintiff and Counterdefendant
BEL AIR MART, a California corporation

1297891.1

1	DATED: January 18, 2013 LAW OFFICE OF JOHN C. LASSNER		
2			
3	By: /s/ John C. Lassner [as authorized on 01/18/13]		
4	JOHN C. LASSNER Attorneys for Plaintiff and Counterdefendant		
5	WONG FAMILY INVESTORS, L.P.		
6	DATED: January 18, 2013 BASSI EDLIN HUIE & BLUM LLP		
7			
8	By: /s/ Farheena Habib [as authorized on 01/18/13]		
9	FARHEENA HABIB Attorneys for CENTURY INDEMNITY COMPANY, on behalf of Defendant and		
10	Counterclaimant THE ESTATE OF RONALD G.		
11	ARMSTRONG, DECEASED		
12	ORDER		
	Pursuant to the joint stipulation of the parties, and good cause appearing, the request to		
13	extend the deadline for Plaintiffs to respond to the Counter and Cross-Claims filed by Century		
14	Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance		
15	Company of North America, as alleged insurer of The Estate of Ronald G. Armstrong, Deceased,		
16	pursuant to California Probate Code section 550 <i>et seq.</i> , is GRANTED. The deadline for		
17	Plaintiffs to respond to the Counter and Cross-Claims is hereby extended from January 25, 2013,		
18	up to and including April 30, 2013. The extension provided for by this Stipulation may be		
19	terminated by any party to this Stipulation by service of written notice of termination served by		
20	hand delivery, email, or facsimile. If the extension provided for by this Stipulation is so		
21			
22	terminated, the deadline for Plaintiffs to respond to the Counter and Cross-Claims filed by		
23	Century shall be 20 days after the date of delivery of the notice of termination.		
24	Dated: January 22, 2013		
25	MORPHSON G. ENGLAND ID CHIEFE HIDGE		
26	MORRISON C. ENGLAND, JR., CHIEF JUDGE UNITED STATES DISTRICT COURT		
27			
28			
	1297891.1		