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7 Attorneys for R. GERN NAGLER, as Trustee
 of the John W. Burns Testamentary Trust, and
 8 ROBERT GERN NAGLER

9 UNITED STATES DISTRICT COURT
 10 EASTERN DISTRICT OF CALIFORNIA

11
 12 BEL AIR MART, a California corporation and
 13 WONG FAMILY INVESTORS, L.P.,

14 Plaintiffs,

15 v.

16 ARNOLD CLEANERS, INC., et al.,

17 Defendants.

Case No. 2:10-CV-02392 MCE-EFB

STIPULATION TO EXTEND
 TIME TO RESPOND TO THE
 CROSS-CLAIM OF ARROWOOD
 INDEMNITY COMPANY
 INSURER OF THE ESTATE OF
 JOHN W. BURNS, DECEASED,
 AND THE ESTATE OF ELICE G.
 BURNS, DECEASED, PURSUANT
 TO PROBATE CODE SECTION
 550 ET SEQ.; ORDER

18
 19
 20 AND RELATED CROSS-ACTIONS.
 21

22
 23 TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD HEREIN:

24 Pursuant to Local Rule 144(a), defendant and cross-claimant Arrowood Indemnity
 25 Company, as alleged insurer of the Estate of John W. Burns, deceased, and the Estate of Elice G.
 26 Burns, deceased, pursuant to Probate code section 550 et seq. (“Arrowood”), by and through its
 27 counsel of record, Alex Potente of Sedgwick LLP, and Defendant and cross-defendant Robert
 28 Gern Nagler, individually (“Nagler”), by and through his counsel of record Eric R. Garner of



1 Wagner Kirkman Blaine Klomprens & Youmans LLP, stipulate and agree as follows:

2 The deadline for Nagler to respond to the Cross-Claim filed by Arrowood shall be
3 extended from February 19, 2013, up to and including April 30, 2013. The extension provided
4 for by this Stipulation may be terminated by any party to this Stipulation by service of written
5 notice of termination served by hand delivery, email, or facsimile. If the extension provided for
6 by this Stipulation is so terminated, the deadline for Nagler to respond to the Cross-Claim filed
7 by Arrowood shall be 20 days after the date of delivery of the notice of termination. No other
8 extensions have been sought as to the Arrowood Cross-Claim. Several other parties have been
9 granted extensions until April 30, 2013, in connection with the Counterclaim/Cross-Claim of
10 Century Indemnity Company, etc., the alleged insurer of The Estate of Ronald G. Armstrong,
11 deceased.

12 Good cause exists for the requested extension. Several parties to this action, including
13 but not limited to the parties to this stipulation, are presently engaged in settlement discussions,
14 have participated in a full day of mediation before Robert Kaplan of Judicate West, and have
15 agreed to continue the mediation to a mutually acceptable date in the future. The parties are
16 hopeful that the continued mediation will take place in late March or April 2013, and are
17 working to coordinate and schedule this continued mediation. Based on the status of the parties'
18 settlement discussions and mediation, as well as other factors, the parties are meeting and
19 conferring about the possibility of filing a joint motion seeking a further brief stay of the
20 litigation. The requested extension would allow the parties to conserve their limited resources
21 while these settlement discussions and mediation are ongoing.

22 DATE: February 8, 2013

WAGNER KIRKMAN BLAINE
KLOMPARENS & YOUMANS LLP

24 By: /s/ Eric R. Garner
Eric R. Garner
Attorneys for Defendant and
25 Counterdefendant Robert Gern Nagler,
26 Individually
27
28

1 DATE: February _8, 2013

SEDGWICK LLP


2 By: /s/ Allison Low [as authorized on 2/8/13
3 Allison Low
4 Attorneys for Cross-Claimant
5 Arrowood Indemnity Company, as alleged
6 insurer of the Estate of John W. Burns, deceased,
7 and the Estate of Elice G. Buns, deceased,
8 pursuant to Probate Code sections 500 et seq.

9 ORDER

10 Pursuant to the joint stipulation of the parties, and good cause appearing therefor, the
11 request to extend the deadline for Defendant Robert Gern Nagler, individually (“Nagler”) to
12 respond to the Cross-Claim filed by Arrowood Indemnity Company as the alleged insurer of the
13 Estate of John W. Burns, deceased, and the Estate of Elice G. Burns, deceased, pursuant to
14 California Probate Code section 550 et seq. (“Arrowood”), is GRANTED. The deadline for
15 Nagler to respond to the Cross-Claim is hereby extended from February 19, 2013, up to and
16 including April 30, 2013. The extension provided for by this Stipulation may be terminated by
17 any party to this Stipulation by service of written notice of termination served by hand delivery,
18 email, or facsimile. If the extension provided for by this Stipulation is so terminated, the
19 deadline for Nagler to respond to the Cross-Claim filed by Arrowood shall be 20 days after the
20 date of delivery of the notice of termination.

21 IT IS SO ORDERED.

22 Dated: March 8, 2013

23 
24 MORRISON C. ENGLAND, JR., CHIEF JUDGE
25 UNITED STATES DISTRICT JUDGE

