1 RICHARD J. DENATALE (SBN 121416) ORRICK HERRINGTON & SUTCLIFFE LLP 2 405 Howard Street San Francisco, CA 94105 3 Telephone No. (415) 773-5700 Facsimile No.: (415) 773-5759 4 Email: rdenatale@orrick.com 5 Attorneys for Defendant PACIFIC GAS AND ELECTRIC COMPANY 6 7 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF CALIFORNIA 10 AMERICAN CASUALTY COMPANY 11 CASE NO. 2:10-CV-02806-LKK-GGH OF READING, PENNSYLVANIA, et al., 12 Plaintiffs, 13 JOINT STIPULATION AND ORDER TO EXTEND RESPONSE DATE v. 14 WESTERN ENVIRONMENTAL 15 CONSULTANTS, INC. et al., 16 Defendants. 17 18 WHEREAS Plaintiffs American Casualty Company of Reading, Pennsylvania, and 19 National Fire Insurance Company of Hartford, successor by merger to Transcontinental 20 Insurance Company ("Plaintiffs") served defendant Pacific Gas and Electric ("PG&E") with the 21 complaint on file in this action on October 26, 2010; 22 WHEREAS, the docket sheet states that PG&E's answer or other responsive pleading 23 was initially due November 16, 2010; 24 WHEREAS, Plaintiffs have agreed that PG&E may have until January 10, 2011 to file 25 an answer or other responsive pleading in order to enable PG&E to obtain outside counsel to 26 represent it in this proceeding and become familiar with the facts and legal issues herein; 27 WHEREAS, on or about December 13, 2010, Richard DeNatale of Orrick Herrington & 28 CASE NO. 2:10-CV-02806-LKK-GGH JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND RESPONSE DATE OHS West:261059649.1

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1	Sutcliffe LLP was retained by PG&E as outside counsel in this action;	
2	WHEREAS, counsel for PG&E have not sought any previous extensions of time from the	
3	Court.	
4	Pursuant to Local Rule 144, Plaintiffs, defendant Western Environmental Consultants,	
5	Inc. ("Western") and defendant PG&E, HEREBY STIPULATE AND AGREE that PG&E shall	
6	have up to and including Monday, January 10, 2011 to answer or otherwise respond to the	
7	complaint filed by Plaintiffs.	
8	DATED: December 21, 2010	ORRICK HERRINGTON & SUTCLIFFE LLP
9		By:/S/ Richard J. DeNatale
10		Richard J. DeNatale
11		Attorneys for Defendant PACIFIC GAS AND ELECTRIC COMPANY
12		
13 14	DATED: December 21, 2010	WOOLS & PEER
15		By: /S/ John E. Peer
16		John E. Peer
17		Attorneys for Plaintiffs AMERICAN CASUALTY COMPANY OF READING, PENNSYLVANIA, and NATIONAL
18		FIRE INSURANCE COMPANY OF HARTFORD, successor by merger to TRANSCONTINENTAL
19		INSURANCE COMPANY
20	DATED D. 1 01 0010	
21	DATED: December 21, 2010	COVINGTON & BURLING LLP
22		By:/S/ Esta L. Brand
23		Esta L. Brand
24		Attorneys for Defendant WESTERN ENVIRONMENTAL CONSULTANTS
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27		
28		
		-2- CASE NO. 2:10-CV-02806-LKK-GGH

IT IS SO ORDERED.

Dated: December 23, 2010.

UNITED STATES DISTRICT COURT

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