1 2 3 4 5	DAVID B. GOODWIN (Bar No. 104469) ESTA L. BRAND (Bar No. 83329) E-mail: ebrand@cov.com MATTHEW J. STEILEN (Bar No. 264236) E-mail: msteilen@cov.com COVINGTON & BURLING LLP One Front Street, 35th Floor San Francisco, CA 94111 Telephone: (415) 591-6000 Facsimile: (415) 591-6091		
6	Attorneys for Defendant		
7	Western Environmental Consultants, Inc.		
8			
9	LINITED STATE	S DISTRICT COURT	
10	UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA		
11	FOR THE EASTERN D	DISTRICT OF CALIFORNIA	
12 13	AMERICAN CASUALTY COMPANY OF READING, PENNSYLVANIA, ET AL.,	Civil Case No. 2:10-CV-02806-LKK-GGH	
14	Plaintiffs,	STIPULATION AND ORDER EXTENDING WESTERN	
15	v.	ENVIRONMENTAL CONSULTING, INC.'S DEADLINE TO RESPOND TO	
16	WESTERN ENVIRONMENTAL CONSULTANTS, INC., et al.	LEXINGTON INSURANCE COMPANY'S AMENDED CROSS-	
17	Defendants.	CLAIM	
18		Judge: Hon. Lawrence K. Karlton	
19			
20		n Insurance Company ("Lexington") filed an	
21	amended cross-claim in this action against Wl	•	
22	WHEREAS, WECI's response to Lexington's amended cross-claim is presently due on		
23	March 3, 2011, having been once extended by 28 days, [Dkt. # 32];		
24	WHEREAS, co-Defendants Underwriters at Lloyd's London ("Lloyd's") and Pacific		
25	Gas & Electric Company notified all parties that during the next week they each intend to file a		
26	Motion to Stay this action pending the resolut		
27	WHEREAS, WECI does not want to incur the expense of filing answers, cross-claims		
28	and counter-claims if this matter is to be stayed;		
	STIPULATION AND ORDER EXTENDING WESTERN ENVIRONMENTAL CONSULTING, INC.'S DEADLINE TO RESPOND TO LEXINGTON INSURANCE COMPANY'S AMENDED CROSS-CLAIM Case No. 2:10-CV-02806-LKK-GGH		
		Dockets.Justia.com	

1	WHEREAS, WECI has requested that the parties agree to extending WECI's deadline to		
2	respond to Lexington's amended cross-claim until two weeks after service of this an order of		
3	this Court either denying or lifting the stay of the action, whichever is later;		
4	IT IS HEREBY STIPULATED, by and between counsel for Lexington, Pacific Gas &		
5	Electric Company, Inc., American Casualty Company of Reading, Pennsylvania and National		
6	Fire Insurance Company of Hartford, Lloyd's, and WECI, that the deadline for WECI to		
7	respond to Lexington's amended cross-claim should be extended until two weeks after service		
8	of an order of this Court either denying or lifting the stay of this action, whichever is later.		
9	Pursuant to E.D. Cal. L.R. 144(a) (Fed. R. Civ. P.6), the parties ask the Court to approve the		
10	extension as indicated by the Order below.		
11			
12		Respectfully submitted,	
13			
14	Dated: March 1, 2011	COVINGTON & BURLING LLP	
15			
16		By <u>/s/ Esta L. Brand</u> Esta L. Brand	
17		Attorneys for Defendant Western Environmental Consultants, Inc.	
18		western Environmental Consultants, mc.	
19	Dated: March 1, 2011	McCORMICK, BARSTOW, SHEPPARD,	
20		WAYTE & CARRUTH LLP	
21		By /s/ Michael Joseph Schmidt	
22		By <u>/s/ Michael Joseph Schmidt</u> (as authorized on 03/01/2011)	
23		Michael Joseph Schmidt Attorneys for Defendant	
24		Lexington Insurance Company	
25	Dated: March 1, 2011	ORRICK, HERRINGTON &	
26		SUTCLIFFE LLP	
27		- 2 -	
28		RDER EXTENDING WESTERN ENVIRONMENTAL CONSULTING,	
		TO LEXINGTON INSURANCE COMPANY'S AMENDED CROSS- CLAIM	
	Ca	ase No. 2:10-CV-02806-LKK-GGH	
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1			
2	By <u>/s/ Richard DeNatale</u> (as authorized on 03/01/2011)		
3	Richard DeNatale Attorneys for Defendant		
4	Pacific Gas & Electric Company		
5	Dated: March 1, 2011 WOOLS & PEER, PC		
6			
7	By/s/ John E. Peer		
8	(as authorized on 03/01/2011) John E. Peer Attorneys for Plaintiffs		
9	American Casualty Company Of Reading, Pennsylvania and National Fire Insurance		
10 11	Company of Hartford, successor by merger to Transcontinental Insurance Company		
11			
12	Dated: March 1, 2011 JAMPOL ZIMET LLP		
14	Dr. /s/ Alen Jampel		
15	By <u>/s/ Alan Jampol</u> (as authorized on 03/01/2011)		
16	Alan Jampol Attorneys for Defendant Underwriters at Lloyd's London		
17			
18	IT IS SO ORDERED.		
19	Dated: March 3, 2011		
20			
21	Javninge K Karlton		
22	LÀWRENCE K. KARLTON SENIOR JUDGE		
23	UNITED STATES DISTRICT COURT		
24			
25			
26 27			
27	- 3 -		
28	STIPULATION AND PROPOSED ORDER EXTENDING WESTERN ENVIRONMENTAL CONSULTING, INC.'S DEADLINE TO RESPOND TO LEXINGTON INSURANCE COMPANY'S AMENDED CROSS- CLAIM Case No. 2:10-CV-02806-LKK-GGH		