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 Global Allies, LLC

8  
 9 UNITED STATES DISTRICT COURT  
 10 EASTERN DISTRICT OF CALIFORNIA

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 12 CONTINENTAL CASUALTY  
 COMPANY and VALLEY FORGE  
 13 INSURANCE COMPANY,

14 Plaintiffs,

15 v.

16 GLOBAL ALLIES, LLC,

17 Defendant.

Case No. 2:11-cv-03237-MCE-KJN

**JOINT STIPULATION AND ORDER  
 TO EXTEND TIME FOR GLOBAL  
 ALLIES TO FILE RESPONSIVE  
 PLEADING**

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**I. STIPULATION**

WHEREAS, on March 25, 2010, a lawsuit was filed against Defendant Global Allies, LLC (“Global Allies”), in the United States District Court for the Northern District of Illinois entitled *Global Total Office, Ltd. et al. v. Global Allies, LLC*, No. 1:10-cv-01896 (hereinafter, the “GTO action”);

WHEREAS, on December 6, 2011, Plaintiffs Continental Casualty Company and Valley Forge Insurance Company (collectively, “Plaintiffs”) filed a complaint for declaratory relief pursuant to 28 U.S.C. §§ 2201 and 2202 in this Court seeking a declaration that they have no duty to defend or indemnify Global Allies under Plaintiffs’ insurance policies with regard to the underlying GTO action;

WHEREAS, the parties to the GTO action participated in a mediation on June 20, 2012 before the Honorable Arlander Keys, Magistrate Judge of the United States District Court for the Northern District of Illinois;

WHEREAS, the parties to the GTO action appear to be close to a settlement in principle and are scheduled to attend a Magistrate Status Hearing on June 27, 2012 before Magistrate Keys to discuss the terms of the potential resolution to the GTO action;

WHEREAS, Plaintiff and Global Allies agree that a settlement in the GTO action may resolve or narrow the issues in this coverage action;

WHEREAS, Plaintiffs and Global Allies entered into a stipulation to extend the time to respond to Plaintiffs’ Complaint in this action on January 4, 2012, extending the time to respond by twenty-eight (28) days;

WHEREAS, on February 6, 2012, Plaintiffs and Global Allies entered into a stipulated eight week stay of this coverage action, which was thereafter ordered by this Court on February 16, 2012;

WHEREAS, on April 11, 2012 Plaintiffs and Global Allies entered into a second stipulated eight week stay of the coverage action, which was thereafter ordered by this Court on April 15, 2012, and which terminated on June 15, 2012;

1           WHEREAS, in light of the status of the GTO action and the settlement in principle,  
2 Plaintiffs and Global Allies have agreed to extend Global Allies' time to file responsive  
3 pleadings for twenty-nine (29) calendar days;

4           Now, therefore, it is hereby stipulated by Plaintiffs Continental Casualty Company  
5 and Valley Forge Insurance Company and Defendant Global Allies, LLC, by and through  
6 their respective attorneys, as follows:

- 7           1.     Global Allies' response to Plaintiffs' complaint will be filed on or before  
8                 July 20, 2012.
- 9           2.     By entering into this Stipulation, neither Plaintiffs nor Global Allies waive  
10                any defenses, rights, or privileges.

11  
12 **IT IS SO STIPULATED.**

13  
14 Dated: June 21, 2012

COLLIAU CARLUCCIO KEENER  
MORROW PETERSON & PARSONS

15  
16 By: /s/ Robert C. Christensen

Robert C. Christensen  
Marsha L. Morrow

17  
18 Attorneys for Plaintiffs

19  Dated: June 21, 2012

PERKINS COIE LLP

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21 By: /s/ John S. Rossiter, Jr.

John S. Rossiter, Jr.

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23 Attorney for Defendant  
Global Allies, LLC.

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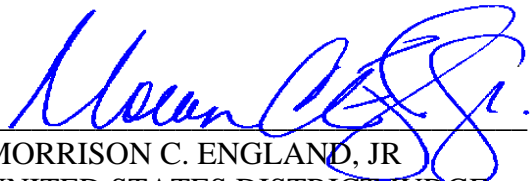
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**II. ORDER**

Pursuant to the stipulation of the parties, the time for Global Allies to respond to Plaintiffs' Complaint is extended to July 20, 2012.

**IT IS SO ORDERED.**

Dated: June 26, 2012

  
MORRISON C. ENGLAND, JR  
UNITED STATES DISTRICT JUDGE