1 2 3 4 5	SINNOTT, PUEBLA, CAMPAGNE & CUR W. David Campagne, #111372 dcampagne@spcclaw.com Blaise S. Curet, #124983 bcuret@spcclaw.com Stephen R. Wong, #186187 swong@spcclaw.com Two Embarcadero Center, Suite 1410 San Francisco, California 94111 Tel + (415) 252 6200; Ferry (415) 252 6224	ET, APLC	
6 7	Tel.: (415) 352-6200; Fax: (415) 352-6224 Attorneys for Defendant, Counter-Complainant and Counter-Defendant STEADFAST INSURANCE COMPANY		
8			
9 10	UNITED STATES DISTRICT COURT		
10	EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION		
12	LENNAR MARE ISLAND, LLC,	Case No. 2:12-cv-02182-KJM-KJN	
13	Plaintiff,	STIPULATION TO CONTINUE	
14	VS.	STEADFAST INSURANCE COMPANY'S MOTION FOR RELIEF	
15	STEADFAST INSURANCE COMPANY,	FROM PRESUMPTIVE DISCOVERY LIMITS FOR DEPOSITIONS	
16	Defendant.		
17			
18	AND RELATED COUNTER-CLAIMS.		
19			
20	IT IS HEREBY STIPULATED and ag	greed by and between Plaintiff and	
21	Counterdefendant LENNAR MARE ISLAN	D ("LMI"), Defendant and Counterclaimant	
22	STEADFAST INSURANCE COMPANY ("STEADFAST") and Counterdefendant and		
23	Counterclaimant CH2M HILL CONSTRUCTORS, INC. as follows:		
24	1. On September 13, 2013, STEADFAST filed its Motion For Relief From		
25	Presumptive Discovery Limits For Depositions (the "Motion") [Dk# 43] and set the		
26	hearing date on the Motion for October 3, 2013.		
27	2. Counsel for LMI is unavailable on that date.		
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	STIPULATION TO CONTINUE DISCOV	I /ERY MOTION AND [PROPOSED] ORDER	

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1	3. The parties have met and conferred and agreed to jointly request that the		
2	Court continue the hearing date for the Motion currently set for October 3, 2013 to		
3	November 21, 2013.		
4 5	DATED: September 17, 2013	PENNINGTON LAWSON LLP	
6 7 8		By: <u>/s/ Ryan L. Werner (authorized 9/17/03)</u> Ryan L. Werner	
9		Attorneys for Plaintiff, Lennar Mare Island, LLC	
10 11	DATED: September 17, 2013	SINNOTT, PUEBLA, CAMPAGNE & CURET, APLC	
12			
13		By:	
14		/s/ Stephen R. Wong Stephen R. Wong	
15 16		Attorneys for Defendant, Countercomplainant and Counterdefendant Steadfast Insurance Company	
10	DATED: September 17, 2013	FARELLA BRAUN + MARTELL LLP	
17			
19 20		By: /s/ Deborah S. Ballati (authorized 9/17/03) Deborah S. Ballati	
21		Attorneys for Counterdefendant and	
22		Counterclaimant CH2M Hill Constructors, Inc.	
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	STIPULATION TO CONTINUE DISCOVERY MOTION AND [PROPOSED] ORDER		

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 18, 2013

KENDAL J. NEWMAN UNITED STATES MAGISTRATE JUDGE

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	STIPULATION TO CONTINUE DISCOVERY MOTION AND [PROPOSED] ORDER