1	HANGON DDIDGETT LLD		
1	HANSON BRIDGETT LLP LINDA E. KLAMM, SBN 71506		
2	lklamm@hansonbridgett.com MILES C. HOLDEN, SBN 263342		
3	mholden@hansonbridgett.com HANI GANJI, SBN 272925		
4	hganji@hansonbridgett.com 425 Market Street, 26th Floor		
5	San Francisco, California 94105 Telephone: (415) 777-3200		
6	Facsimile: (415) 541-9366		
7	Attorneys for Plaintiff LEVIN ENTERPRISES, INC.		
8			
9	UNITED STATES DISTRICT COURT		
10	EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION		
11	LEVIN ENTERPRISES, INC.,	CASE NO. 2:14-CV-01479-MCE-AC	
12	Plaintiff,	STIPULATION AND [PROPOSED] ORDER TO RESCHEDULE	
13	v.	SETTLEMENT CONFERENCE	
14	MARYLAND CASUALTY COMPANY as successor in interest to Maine Bonding &		
15	Casualty Company; MAINE BONDING &	Judge: Hon. Carolyn K. Delaney	
16	CASUALTY COMPANY; and GRANITE STATE INSURANCE COMPANY,	Complaint filed: June 20, 2014	
17	Defendants.		
18		I	
19	This Stipulation is entered into by and between Plaintiff, LEVIN ENTERPRISES, INC.		
20	("LEVIN") and Defendants ZURICH AMERICAN INSURANCE COMPANY ("Zurich		
21	American") as successor in interest to MAINE BONDING & CASUALTY COMPANY, which		
22	Zurich American contends was erroneously sued as "MARYLAND CASUALTY COMPANY a		
23	successor in interest to Maine Bonding & Casualty Company; MAINE BONDING &		
24	CASUALTY COMPANY"; and GRANITE STATE INSURANCE COMPANY ("GRANITE")		
25	RECITALS		
26	1. On April 2, 2015, the parties med	iated the matter before Mr. Craig Meredith of	
27	JAMS. While the parties were not able to resolve the case at that time, they agreed to a further		
28	exchange of information and documents to assist in a good faith attempt to settlement the matter		

1	2. The parties, however, are still in the process of exchanging information and		
2	documents and will not complete their review before the April 28, 2015 Settlement Conference.		
3	Thus, the parties cannot engage in meaningful settlement discussions at the currently scheduled		
4	April 28, 2015 Settlement Conference.		
5	3. Based on LEVIN's counsel's discussion with Mr. Kyle Owen, Judge Delaney's		
6	Courtroom Deputy, the Settlement Conference may be rescheduled to August 14, 2015. This date		
7	will give the parties sufficient time to complete their exchange and review of documents and		
8	engage in further settlement discussions.		
9	IT IS HEREBY STIPULATED AND AGREED:		
10	5. Pursuant to Local Rules 143 and 144(a), the Settlement Conference currently		
11	scheduled for April 28, 2015 will be rescheduled to August 14, 2015.		
12	DATED: April 21, 2015 HANSON BRIDGETT LLP		
13			
14	By: <u>/s/ Hani Ganji</u> LINDA E. KLAMM	-	
15	MILES C. HOLDEN		
13	HANI GANJI Attorneys for		
16	LEVIN ENTERPRISES, INC		
17	DATED: April 21, 2015 SELMAN BREITMAN LLP		
18			
19 	By: /s/ Mark E. Inbody	_	
19	LINDA WENDELL HSU MARK E. INBODY		
20	Attorneys for		
21	ZURICH AMERICAN INSURANCE COMPANY		
22	DATED: April 21, 2015 LYNBERG & WATKINS		
23			
24	By: /s/ Jerome P. Doctors	_	
25	R. JEFF CARLISLE JEROME P. DOCTORS RYAN C. BYKERK		
	Attorneys for		
26	GRANITE STATE INSURANCE COMPANY		
27			
28			

11109373.1